

# **Exhibit B**

**IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA**

KAITLYN REICHWALDT,

Plaintiff,

vs.

GENERAL MOTORS LLC,

Defendant.

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CIVIL ACTION FILE NO.

**16 A 1405-2**

**JURY TRIAL DEMANDED**

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**COMPLAINT FOR PERSONAL INJURY AND PUNITIVE DAMAGES**

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CAROLE T. DAVIS  
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COBB COUNTY, GA  
CLERK'S OFFICE  
105 13<sup>th</sup> Street  
Columbus, Georgia 31902

*Attorneys for Plaintiff*

Plaintiff Kaitlyn Reichwaldt files this Complaint for Personal Injury and Punitive Damages against Defendant General Motors LLC (“GM LLC”), showing this Honorable Court the following:

## I. INTRODUCTION

### 1.

This is yet another case for another victim of GM's<sup>1</sup> “CK” pickup trucks with gas tanks located *on the side* of the truck outside the frame rails with no protection from side impact. The gas tanks were located in a known “crush zone” – in an area GM knew was vulnerable to side impact. GM sold those CK pickups for 15 years, from 1973 until 1987. Hundreds of Americans have burned, most to death, as a result of that design. The design is *indefensible*. As GM engineer Edward Ivey testified *twenty two years ago*:

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<sup>1</sup> All references to “GM” contained herein that discuss conduct occurring before June 1, 2009, are referring to the conduct of General Motors Corporation (“GM Corp.”) References to GM contained herein that discuss conduct occurring after June 1, 2009 are referring to the conduct General Motors LLC (“GM LLC”). As discussed more fully below, GM LLC expressly agreed to be subject to suit for product liability claims for wrecks occurring after June 1, 2009 in vehicles built by GM Corp. before that date.

Q: Can you name a worse place to put a fuel tank than outside the frame rail on the side?

A: Well, yes, you could put it on the front bumper.<sup>2</sup>

2.

Despite actual knowledge of the defect and of the danger, despite hundreds of cases settled by GM, despite GM's own long-concealed crash tests that proved the tanks were vulnerable to rupture and explosion, GM continues to deny the obvious - that the design is indefensible - and continues to refuse to warn Americans of the danger.

3.

The CK litigation has been fought in courtrooms all across America for decades now, involved the concealment of evidence and the alleged destruction of documents,<sup>3</sup> and embroiled law firms from around the country, including from Atlanta.

4.

This particular case involves severe burn injuries suffered on January 27, 2015 by then-19 year old Kaitlyn Reichwaldt as a result of a GM CK pickup truck

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<sup>2</sup> 1/9/94 Deposition of Edward Ivey, Bishop v. GM & Cameron v. GM, at 98/11-16.

<sup>3</sup> In a 1992 deposition GM engineer Theodore Kashmerick testified that documents retrieved from him were "shredded." *Elwell v. GM*, 91-115946-NZ, Circuit Court of Wayne County, Michigan, 12/29/92 at pp. 13/3-7, 24/5-20.

sliding into her 2003 Taurus. The CK pickup had a gas tank mounted *on the side* of the vehicle outside the frame rails, unprotected by anything but body side sheet metal, and affixed to the rigid steel frame rail.

5.

Kaitlyn Reichwaldt was driving on Salt Creek Roadway, a divided four-lane road near the University of Nebraska in the city of Lincoln, Nebraska, with a raised median separating the lanes going eastbound and the lanes going westbound. A 1984 GM CK pickup truck with a side-mounted gas tank spun out of control and crossed the median. The side of the CK pickup struck the front of Ms. Reichwaldt's vehicle – right at the side-mounted gas tank. The gas tank was crushed against the steel frame rail, gas sprayed over Ms. Reichwaldt's vehicle including into the passenger compartment, the gas exploded, and she was severely burned. But for the heroic actions of a bystander who pulled her from her burning car, Kaitlyn Reichwaldt surely would have burned to death. Kaitlyn Reichwaldt did nothing wrong; she was entirely innocent. But for the burns, Ms. Reichwaldt would have been uninjured in the wreck.

6.

The first CK pickup sold by GM was the model year 1973 pickup. GM knew before that first CK pickup was sold that it posed a singular and unique

danger to occupants and to others on the road, because the gas tanks were located on the side of the truck outside the frame rail, *in the crush zone*, and affixed to rigid steel frame rails – against which the gas tanks could be crushed if the side of the truck was hit by or hit another car or any other object. That gas tank design is indisputably vulnerable to side impact.

7.

The risk of post collision fuel fed fire (“PCFFF”) is, of course, horrific – as the history of GM’s CK pickup trucks proves. Far too often people who should not have been seriously injured at all in wrecks have been burned, or have burned to death, because GM chose to put its gas tanks on the side of the CK pickups.

8.

That gas tanks located in a known crush zone make occupants and others vulnerable to horrific injuries or death has long been well known in the automotive industry.<sup>4</sup>

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<sup>4</sup> See, e.g., June 3, 2013 NHTSA “recall request letter,” sent to Chrysler: “The vulnerability of tanks located behind solid rear axles in rear impacts became well known following a series of fiery crashes involving the Ford Pinto. . . . It was a well-publicized, terrible tragedy that people burned to death in these vehicles.” GM’s side-mounted gas tanks were even *more* vulnerable – they were closer to a striking vehicle than most rear-mounted gas tanks, and even less protected. “In June 1978, Ford agreed to recall the Pinto and Bobcat. The defect was that the fuel tanks installed on these vehicles are subject to failure when the vehicles are struck from the rear.” *Id.* GM, by contrast, has never recalled the CK pickups, never

9.

GM has itself long known that gas tanks must not be located where they are unprotected from impact – and especially should not be located *outside* the frame rail:

- (a) In 1930, GM published an ad for a Chevrolet stating the gas “tank is thoroughly protected by the wide rear cross member and heavy frame side members.”
- (b) In 1932, the Society of Automotive Engineers (“SAE”) published a paper stating that the gas tank “should be protected by the body and the frame.”
- (c) In 1964, a GM Executive Engineer wrote a “Design Directive” stating “the fuel tank must be mounted as near to the center of the vehicle (truck) as practical.”
- (d) In 1974 the SAE published another paper stating that truck gas tanks should be located *inside* “rugged frame channels.”
- (e) In 1978, a “jury” of GM engineers studying “alternative fuel tank locations” for trucks recommended the inside the frame rails location.
- (f) In 1981, GM’s own secret and long-concealed vehicle-to-vehicle side-impact collision tests gave GM actual notice and knowledge that gas

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admitted the danger, and never warned anyone of the danger.

tanks mounted on the side outside the frame rails were vulnerable to rupture in side impact.

(g) In 1981, GM advertised about its new S-10 pickups, “fuel tank is located *inside* the left hand *frame rail* for protection from side impacts.”

(h) In 1982, a GM engineer estimated the cost to “relocate” the CK side-mounted gas tanks to an inside the frame rails location would be only \$1.33 per tank.

(i) By 1983, GM was already designing the new 1988 GM pickup with the gas tank located inside the frame rail for “added protection” in side impacts, and a GM engineer’s presentation about the new pickup stated the inside the frame rail location is “much less vulnerable.”

(j) In 1985, a GM engineer made a presentation to the President of GM, stating that the CK pickup “is subject to intense pressure as a result of litigation due to PCFFF,” and noted that the planned new design with an inside the frame rail gas tank will “reduce this concern.”

(k) When finally, in 1988, GM moved the gas tank to the inside the frame rail location, GM issued a “confidential” directive to its sales staff stating “fuel tank is located *inside the frame rail* to reduce the chance of fuel spillage on side impact.”

10.

In May 1972, one of GM's testifying engineers prepared a memo – before the CK trucks were first sold as model year 1973 vehicles – attesting to the fact that a gas leak “should not occur” unless the impact itself was great enough to cause fatalities.

11.

GM put the gas tank on the side of its CK pickups solely for marketing reasons – so GM could advertise that the pickup had a larger gas tank and greater range.

12.

It was feasible and practical for GM to design and build the subject pickups with gas tanks located inside the frame rail.

13.

GM's awareness of the horrific risk is reflected by its preparation, in 1973 – the first model year GM sold its CK pickups, of a “cost-benefit analysis” which concluded that it was cheaper for GM to settle PCFFF cases than to eliminate all PCFFFs in GM vehicles. That “cost benefit analysis” came to be known as the

“Ivey memorandum,” named after the engineer who prepared it for GM at the direction of his superiors.<sup>5</sup>

14.

For years GM actively concealed the “Ivey memorandum” from plaintiffs, courts, and juries. When it was finally discovered, Ivey was deposed. His sworn testimony was totally contrary to what he had told GM lawyers about the memorandum prior to that deposition. That ultimately resulted in a Court Order finding that “GM in fact acted [to] commit crimes and frauds,” and that GM had, by concealing the Ivey memorandum, violated Court Orders in other cases.<sup>6</sup>

15.

In 1973 – the year they were first sold – GM claimed its first CK truck fire victim: Ernest Leon Smith of Columbus, Muscogee County, Georgia.

16.

Initially, GM defended some CK lawsuits, trying a few cases, but settling far more. In 1993, GM was forced to try the case of *Moseley v. GM* in Atlanta,

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<sup>5</sup> Ivey calculated that if GM paid an average of \$200,000.00 per claim for those claims alleging death by fire the cost to GM would be \$2.40 per GM vehicle sold. Ivey calculated it would be worth \$2.20 per vehicle for GM to prevent all deaths by fire in GM vehicles.

<sup>6</sup> *Bampoe-Parry v. GM*, State Court of Fulton County, Ga., Civil Action File Nos. 98V50138297J & 98V50138298J, Sept. 9, 1999.

Georgia. That trial resulted in a widely-publicized \$105 million verdict, including punitive damages.<sup>7</sup> The *Moseley* case arose after seventeen year old Shannon Moseley of Snellville, Georgia was burned to death when his CK pickup was hit in the side. His parents refused to settle. After the \$105 million verdict in the trial of *Moseley v. GM*, GM tried only two other CK cases: both were cases where the impact forces were so great the alternative gas tank location was also severely compromised. Those were cases GM should not have been able to lose.

17.

For many years in the 1970s and 1980s, GM's principal testifying in-house engineer for fire cases was Ronald Elwell. He defended the CK truck in depositions. He testified under oath that GM had conducted no vehicle-to-vehicle crash testing of the CK trucks. Then, in 1983, Elwell was told by GM Executive Vice President Alexander McKeen that he ought to go out to the GM proving grounds – that he might find something there interesting. Elwell did so, and found “over 20” CK trucks that had been subjected to vehicle-to-vehicle crash testing. Elwell subsequently testified, in the *Moseley* trial, about the gas tanks on those pickups: “they were badly smashed. There were holes in them as big as melons.

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<sup>7</sup> *Moseley v. GM* was reversed on appeal and then settled by GM just before retrial, along with three other CK cases.

They were split open.” McKeen told Elwell those crash tests were done starting in 1981 after GM Assistant General Counsel Babcock told McKeen “they could no longer defend the product.” The existence of those crash tests had never been revealed by GM to any court, jury, or plaintiff.<sup>8</sup>

18.

After seeing those crashed CKs, Elwell complained to his superior that he might have unintentionally committed perjury. GM never again had him testify in a CK fire case.<sup>9</sup>

19.

By 1982 fire cases were causing GM so much trouble that then-CEO Roger Smith ordered a roundup of all internal GM documents that might be subject to requests for documents in fire cases. Initially the search was for documents relating to passenger cars; by 1983 the search was expanded to include trucks. GM called upon its various “regional counsel” law firms to send young lawyers to Detroit to review all the collected documents. Internally, GM staff referred to the young lawyers as the “firebabies.”<sup>10</sup>

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<sup>8</sup> *Moseley v. GM*, 1-14-93 Trial Transcript Vol. 13 (Elwell) at 126/9-127/1, 127/16-134/20.

<sup>9</sup> *Moseley v. GM*, 1-14-93 Trial Transcript Vol. 13 (Elwell) at 135/12-22.

<sup>10</sup> Dep. of GM lawyer Brian Eyes, 93 1083 CBM, US District Court, Central Dist. of CA, 9/29/93 at pp. 202/21-203/6.

20.

GM has been sued in hundreds of cases as a result of people being burned in PCFFFs involving GM's CK pickups with outside the frame rail gas tanks.

21.

What happened on January 27, 2015, was not merely foreseeable to GM; *it was foreseen* by GM – it had happened over and over again, to GM's actual knowledge. Plaintiffs' counsel are aware of some 957 other incidents involving PCFFF in GM's CK pickups with outside the frame rail gas tanks.<sup>11</sup>

22.

GM quit making the CK pickups after model year 1987, and for model year 1988, GM finally moved the gas tank to the alternative location advocated by safety experts for decades – to an inside the frame rail location, where the gas tank is protected from side impacts.

23.

In addition to Kaitlyn Reichwaldt, many other victims who were not even

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<sup>11</sup> See Exhibit A hereto: Plaintiffs' list of 782 other such incidents, *Byrd v. GM*, M.D. Mt, 1998, CV-98-168-M-DWM. In 2015 GM acknowledged another 175 such incidents since the *Byrd* case was settled. See Exhibit B hereto, *Williams v. GM*, N.D. Ga. Case No. 1:14-CV-02908. In *Williams v. GM*, GM admitted that it had notice that there was a fire following a CK wreck in 718 of the incidents identified in Exhibit A. See Exhibit C hereto.

occupants of GM's CK pickups have been burned when a crash ruptured the side-mounted gas tank of a CK. Examples include but are not limited to:

- (a) On December 5, 1973, Ernest Leon Smith of Columbus, Georgia was driving a Nash Rambler station wagon when a 1973 CK truck turned left in front of his car, causing Mr. Smith's car to strike the right side of the truck, rupturing the gas tank and causing a fire. The whole left side of Mr. Smith's face and torso were burned; he suffered a stroke while in the hospital after seeing himself in the mirror and never fully recovered prior to his death in 1997.
- (b) On October 29, 1992, thirty year old Calvin Cockrum of Altoona, Kansas was burned to death when his motorcycle slid and hit the side-mounted gas tank on a CK, dousing him with gas which exploded.
- (c) On October 8, 1995, Jerome Dalton of Greene County, Georgia was burned to death when his motorcycle slid and hit the side-mounted gas tank on a CK, dousing him with gas which exploded.
- (d) On August 31, 1996, Denise Barnes of Columbia, South Carolina was burned to death when her 1994 Saturn struck the side of a CK.
- (e) On May 26, 2000, Corinne Gallagher of Flathead, Montana and all three of her sons, Thomas (8), Anthony (10) and Patrick (12), burned to death

when the Hyundai she was driving was struck by a CK resulting in gas tank rupture and PCFFF.

24.

Many families have suffered multiple losses as a result of PCFFF after a CK's outside the frame rail gas tank was ruptured. In addition to Corinne Gallagher and all three of her sons, examples include:

- (a) On May 20, 1990, a car ran a stop sign in Elfrida, Arizona and hit Daniel Hannah's CK in the side. Mr. Hannah was severely burned trying to save his two sons, Nathan 16 and Gabriel 17, who were trapped inside the pickup. Mr. Hannah testified that the flames were "as high as trees." He was unable to get his sons out of the vehicle, and saw them burn to death.
- (b) On July 15, 1995, Steven Seebeck of Bryan County, Georgia along with his young son Michael Seebeck were traveling in a 1979 CK pickup in Fort Stewart, Georgia when a car crossed the center line and collided with the pickup rupturing the gas tank and causing a PCFFF. Both father and son burned to death.
- (c) On December 22, 1997, Darrell Byrd and Angela Byrd along with their two sons, Timothy and Samuel, were traveling from Fortine, Montana to North Carolina to visit family for Christmas. Near Russell, Kansas, the

1985 CK truck they were traveling in collided with a tractor trailer.

Darrell, Angela and Timothy all burned to death. Samuel was burned, but survived.

25.

That the problem with the CK trucks and PCFFF was in fact the gas tank location *was admitted* by the very first witness *GM itself called* to testify at the *Moseley* trial, a professional engineer and Georgia Tech graduate who was then County Engineer for Gwinnett County, George Black.<sup>12</sup> Black investigated the *Moseley* wreck, which GM claimed was a “high speed” wreck. Black testified to a wreck involving a CK truck in a parking lot where the gas tank ruptured, and admitted that it was “reasonable to say that when you get failures at high speed and failures at low speed that tends to indicate the problem isn’t the speed, the problem is the location of the fuel tank.”<sup>13</sup> Mr. Black also confessed that he had told the plaintiffs’ accident reconstruction engineer that “you don’t have to be a rocket scientist to understand that the fuel tank should not be outside the frame.”<sup>14</sup>

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<sup>12</sup> Black subsequently was appointed by the President as a member of the National Transportation Safety Board, where he served two terms.

<sup>13</sup> *Moseley v. GM*, 1-22-93 Trial Transcript (Black) Vol. 20 at 112/7-23.

<sup>14</sup> *Moseley v. GM*, 1-22-93 Trial Transcript (Black) Vol. 20 at 107/14-18.

26.

Because GM never warned anyone of the danger, there are still hundreds of thousands of GM's CK pickups on the roads of American, capable of causing the mayhem visited upon Kaitlyn Reichwaldt on January 27, 2015. GM's reckless and wanton failure to warn Americans of the danger has been continuous since the CK pickup that struck Ms. Reichwaldt's car was manufactured in 1984. That failure to warn continues to this day.

27.

The terrible defect of the gas tank location on GM's CK pickups continues to put American citizens at risk of horrible injuries and death, and continues to cause injuries and deaths due to fire.

28.

GM now defends lawsuits such as this by trying to distinguish between what it calls "old GM" and "new GM," which GM calls "GM LLC," despite the fact that GM expressly agreed, with Congress and with the Bankruptcy Court in 2009, that it would be liable for all damages resulting when people were injured post-bankruptcy in vehicles manufactured pre-bankruptcy.

29.

In the wake of the GM ignition switch scandal, GM CEO Mary Barra appeared before the United States Congress.

30.

On June 5, 2014 the GM CEO told the Congress and the American people "I am guided by two clear principles: First, that we do the right thing for those who were harmed; and, second, that we accept responsibility for our mistakes and commit to doing everything within our power to prevent this problem from ever happening again."

31.

On June 18, 2014 the GM CEO told the Congress "we have a special responsibility to [the families that lost loved ones, and those who suffered physical injury], and the best way to fulfill that responsibility is to fix the problem by putting in place the needed changes to prevent this from ever happening again."

32.

On April 2, 2014, the GM CEO told the Congress "we will not shirk from our responsibilities now or in the future."

33.

Those statements made by GM's CEO speaking for GM<sup>15</sup> are totally and utterly contrary to GM's reckless and wanton failure to warn Americans of the danger posed by its CK pickups with side-mounted gas tanks.

34.

Despite those statements to the United States Congress and the American people, *GM has denied* "that American citizens have a right to know when GM has identified safety concerns with its vehicles."<sup>16</sup> *GM has denied* that "GM was aware there was a safety concern regarding its CK pickup trucks."<sup>17</sup> *GM has refused to admit* "that every human life is worth protecting from preventable injuries caused by design and manufacturing defects."<sup>18</sup> *GM has refused to admit* "that if there is a safety defect in a GM vehicle GM should warn the public."<sup>19</sup> *GM has refused to admit* "that if GM knows it can take action to save a human life from a preventable death, it has a duty to do that."<sup>20</sup> *GM has refused to admit* "that

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<sup>15</sup> *Synovus v. GM*, GM Answers to Plaintiffs' Second Requests for Admission, *Williams v. GM*, number 5.

<sup>16</sup> *Id.*, numbers 29, 31.

<sup>17</sup> *Id.*, number 32.

<sup>18</sup> *Id.*, number 34.

<sup>19</sup> *Id.*, number 37.

<sup>20</sup> *Id.*, number 42.

if GM knows it can take action to save a human life from a preventable death, it has a civic responsibility to do that.”<sup>21</sup>

## **II. PARTIES, JURISDICTION, VENUE, AND SERVICE OF PROCESS**

35.

Plaintiff Kaitlyn Reichwaldt resides at 5162 Running Doe Drive, Suwannee, GA 30024, is subject to the jurisdiction of this Court, and is a resident of the State of Georgia.

36.

Defendant GM LLC is a limited liability company organized and incorporated under the laws of Delaware, with a principal place of business located at 300 Renaissance Center, Detroit, Michigan 48265. GM LLC is engaged in the business of designing, manufacturing, marketing, promoting, advertising, distributing, and selling automobiles, trucks, SUVs, and other types of vehicles in the State of Georgia, throughout the United States, and elsewhere.

37.

GM LLC is subject to the jurisdiction of this Court because it transacts business in, has registered as a foreign LLC transacting business in and maintains a registered agent in the State of Georgia. The registered agent for GM LLC is: CSC

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<sup>21</sup> *Id.*, number 45.

of Cobb County, Inc., 192 Anderson Street S.E., Suite 125, Marietta, Georgia 30060, where GM LLC may be served with legal process. By registering to do business and appointing a registered agent for service of process in Georgia, GM LLC has consented to jurisdiction in this state.

38.

GM LLC also is subject to general personal jurisdiction in the state of Georgia because GM LLC is essentially at home in the State of Georgia. In 2012, GM LLC purchased property and invested more than \$25 million in this state to build an Information Technology Innovation Center (“IT Innovation Center”) in Roswell, Georgia. The IT Innovation Center, which is one of only four such centers nationwide, coordinates, facilitates and runs information technology services including research and design functions for GM LLC’s nationwide and worldwide business operations. In a press release announcing the decision to locate the IT Innovation Center in Georgia, the GM LLC Chief Information Officer, Randy Mott, referred to the IT Innovation Center as “critical to [GM’s] overall business strategy.” In exchange for selecting Georgia as the home of an IT Innovation Center, GM LLC asked for and received more than \$20 million in tax incentives from the state of Georgia. In total, GM LLC employs more than 1,000 Georgia residents as employees at the IT Innovation Center. As a result of the

foregoing, GM LLC has chosen to be essentially at home in the state of Georgia and is subject to general personal jurisdiction in this state.

39.

Venue is proper in Cobb County as to Defendant GM LLC under O.C.G.A. § 14-2-510 and GA. CONST. art. VI, § 2, ¶ VI, because Cobb County is where Defendant GM LLC maintains a registered agent.

### **III. OPERATIVE FACTS**

40.

The excruciating thermal burns suffered by Kaitlyn Reichwaldt were the direct and proximate result of the explosion and fire.

41.

Consumed by the fire and smoke engulfing her car, Ms. Reichwaldt consciously suffered and endured shock, terror, fright, physical and mental pain, suffering, and injuries.

42.

The fire and fire-related injuries of Kaitlyn Reichwaldt were caused by design defects in the 1984 GM CK pickup.

43.

Before it designed, built, and sold the subject pickup, GM knew that the fuel

system design of the subject pickup was defective and vulnerable to side impact. GM also knew that a midship gas tank located inside the frame rails and between the axles would be a much less vulnerable location than the side-mounted gas tank outside the frame rails. GM LLC acquired that same notice. After June 1, 2009, GM LLC was independently put on that same notice.

44.

Before it designed, built, and sold the subject pickup, GM knew that locating the gas tank inside the frame rails and between the axles would provide much greater protection during side impacts, resulting in increased protection for occupants of the pickups and anyone whose vehicle is hit by or hits a CK. GM LLC acquired that knowledge. After June 1, 2009, GM LLC independently obtained that same knowledge.

45.

Before and after GM designed, built and sold the subject pickup and before Kaitlyn Reichwaldt's injuries, GM knew that a vehicle with a gas tank mounted on the side, *outside* of the frame rail, was more likely to leak gas as a result of a rupture in a side-impact collision than a vehicle with a gas tank mounted *inside* of the frame rail. GM LLC acquired that knowledge. Since June 1, 2009, GM LLC has independently obtained that same knowledge.

46.

Before and after GM designed built and sold the subject pickup and before Kaitlyn Reichwaldt's injuries, GM knew that when a vehicle with a gas tank mounted on the side, outside of the frame rail, was struck during a side-impact collision, a deadly post-collision fuel fed fire was a clear risk. GM LLC acquired that knowledge. Since June 1, 2009, GM LLC has independently obtained that the same knowledge.

47.

GM Corp. and GM LLC have affirmatively tried to keep citizens and potential victims ignorant of dangers posed by GM Corp.'s side-mounted gas tanks.

48.

As a direct result of GM Corp.'s and GM LLC's conduct outlined above, Kaitlyn Reichwaldt was severely burned by fire.

49.

In 2009, after GM Corp. filed for Chapter 11 bankruptcy protection, Defendant GM LLC purchased the assets of GM Corp., including GM Corp.'s books and records.

50.

As part of its 2009 purchase of GM Corp., Defendant GM LLC expressly assumed liability for product liability claims against GM Corp. arising from wrecks occurring after the sale.

51.

After the bankruptcy sale, Defendant GM LLC employed nearly all of GM Corp.'s employees. In short, GM LLC acquired all specific knowledge about the subject pickup previously possessed by GM Corp.

52.

Defendant GM LLC could have reasonably foreseen and did, in fact, foresee the occurrence of side impact collisions resulting in fires such as the one described in this Complaint.

53.

Since the bankruptcy sale, Defendant GM LLC has acquired from GM Corp. and obtained on its own actual knowledge that a gas tank located on the side of a pickup in a known crush zone is vulnerable to side impact, and that the result can be, and often has been, fires that seriously burn and/or kill vehicle occupants and others.

54.

Despite knowledge of its duty to warn the public, Defendant GM LLC failed at the time of the bankruptcy sale—and all times since—to warn the public, and Plaintiff in particular, of the dangers in a foreseeable wreck caused by the design of the CK trucks.

55.

Defendant GM LLC's reckless, and wanton conduct constituted disregard for the life and safety of Kaitlyn Reichwaldt and the lives and safety of the motoring public generally. GM LLC's reckless, and wanton conduct also manifests a conscious indifference to the foreseeable consequences of that conduct to people like Kaitlyn Reichwaldt.

### **III. LIABILITY OF GM LLC**

#### **COUNT ONE – NEGLIGENCE & STRICT LIABILITY**

56.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 55 as if fully set forth herein verbatim.

57.

The subject pickup was designed, manufactured, marketed, and distributed by GM.

58.

GM had a duty to exercise reasonable care to design, engineer, test, manufacture, inspect, market, distribute, and sell safe vehicles so as not to subject consumers or motorists to an unreasonable risk of harm. GM breached its duty to exercise reasonable care with respect to the subject pickup.

59.

The subject pickup, when distributed by GM, had a defectively designed gas system which caused the subject pickup to explode, which explosion and fire engulfed the subject pickup. The defective design of the fuel system proximately caused the injuries to Kaitlyn Reichwaldt.

60.

Despite GM's knowledge that the gas tank on its pickup trucks must be mounted as near the center of the vehicle as practical, GM made the decision to place the gas tank outside the frame rail on the subject pickup for marketing reasons.

61.

GM violated its own internal design directive by placing the gas tank in a known crush zone.

62.

GM violated its own internal design directive by not properly eliminating or shielding the gas tank from all objects which could result in cutting or puncturing of the gas tank.

63.

GM failed to design a fuel system whereby the gas tank was protected from rupture due to side impact or sharp objects, despite the fact it was technologically feasible and economically practicable to so design the fuel system.

64.

GM elected not to implement technologically feasible, economically practicable, and fundamentally safer alternative designs for the gas tank location and design on the subject pickups.

65.

GM instead elected a design and gas tank location that it absolutely knew would result in fires, injuries, and deaths in foreseeable side-impacts.

66.

Defendant GM's negligence and reckless and wanton misconduct proximately caused the injuries to Kaitlyn Reichwaldt.

67.

GM is strictly liable in tort for the injuries to Kaitlyn Reichwaldt.

68.

Defendant GM LLC assumed liability for product liability claims against GM Corp. that arose after the bankruptcy sale. Plaintiff's negligence and strict liability claims against GM Corp. are properly asserted against GM LLC.

**COUNT TWO – RECKLESS & WANTON MISCONDUCT**

69.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 68 as if fully set forth herein verbatim.

70.

GM Corp.'s and GM LLC's misconduct was a reckless and wanton disregard for the lives and wellbeing of the public, and of untold numbers of victims, including Kaitlyn Reichwaldt.

71.

The reckless and wanton misconduct by GM Corp. and by GM LLC proximately caused the burn injuries to Kaitlyn Reichwaldt.

72.

Plaintiff is entitled to recover damages from GM LLC pursuant to O.C.G.A.

§ 51-1-11 (the “statute of repose”) and other applicable law.

**COUNT THREE – FAILURE TO WARN**

73.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 72 as if fully set forth herein verbatim.

74.

As manufacturers of vehicles distributed and sold to the public, GM Corp. and GM LLC have a duty to adequately warn the public about dangers they know exist in their vehicles.

75.

By failing to warn of the danger, GM. Corp. and GM LLC breached their duty and obligations to the public, including Kaitlyn Reichwaldt.

76.

GM Corp.’s failure to warn citizens about the dangers of its side-mounted gas tanks, but to instead profess for decades that no such danger exists, and GM LLC’s similar failure to warn since June 1, 2009, was itself reckless and wanton.

77.

GM Corp.’s and GM LLC’s election not to warn of the known defective and unreasonably dangerous conditions in the subject pickup proximately caused the

injuries to Kaitlyn Reichwaldt.

78.

Plaintiff is entitled to recover damages from GM LLC as a result of GM LLC's and GM Corp.'s failure to warn.

79.

Defendant GM LLC assumed liability for product liability claims against GM Corp. that arose after the bankruptcy sale. Plaintiff's failure to warn claim against GM Corp. is properly asserted against GM LLC.

80.

Plaintiff is entitled to recover damages from GM LLC pursuant to O.C.G.A. § 51-1-11 (the "statute of repose") and other applicable law.

#### **COUNT FOUR – PUNITIVE DAMAGES**

81.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 80 as if fully set forth herein verbatim.

82.

GM LLC has been guilty of such willful misconduct, malice, fraud, wantonness, oppression, and an entire want of care that its misconduct is sufficient to raise the presumption of conscious indifference to the consequences.

83.

GM LLC's misconduct is so aggravating it authorizes, warrants, *and demands* the imposition of substantial punitive damages against GM LLC pursuant to O.C.G.A. § 51-12-5.1.

#### **COUNT FIVE – EXPENSES OF LITIGATION**

84.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 83 as if fully set forth herein verbatim.

85.

GM LLC has acted in bad faith, has been stubbornly litigious, and has caused the Plaintiff unnecessary trouble and expense, entitling Plaintiff to recover from Defendant all costs of litigation, including attorneys' fees and expenses, pursuant to O.C.G.A. § 13-6-11 and other applicable law.

#### **IV. DAMAGES SOUGHT**

86.

Plaintiff re-alleges and reincorporates Paragraphs 1 through 85 as if fully set forth herein verbatim.

87.

The damages claimed by Plaintiff were proximately caused by the tortious

acts and omissions of Defendant.

88.

Plaintiff Kaitlyn Reichwaldt seeks all damages allowed by law, including the following:

- (a) shock, fright, and terror experienced from the time of the incident;
- (b) mental and physical pain and suffering endured from the time of the incident;;
- (c) past and future medical bills;
- (d) punitive damages to punish and deter GM LLC pursuant to O.C.G.A. § 51-12-5.1; and
- (e) attorneys' fees and litigation expenses pursuant to O.C.G.A. § 13-6-11 and other applicable law.

#### **V. PRAYER FOR RELIEF**

WHEREFORE Plaintiff prays for the following relief:

- (a) That summons issue requiring Defendant to appear as provided by law to answer this Complaint;
- (b) That service be had upon Defendant as provided by law;
- (c) That Plaintiff have and recover all damages for all losses compensable under Georgia law as set forth above;

- (d) That the Court award and order punitive damages against Defendant;
- (e) That all expenses of litigation, including attorneys' fees, be cast against Defendant;
- (f) That Plaintiff have a trial by jury; and
- (g) For such other and further relief as the Court shall deem just and proper.

**PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY.**

This 19th day of May, 2016.

BUTLER WOOTEN CHEELEY & PEAK LLP

BY:



JAMES E. BUTLER, JR.  
Georgia Bar No. 099625  
ROBERT H. SNYDER  
Georgia Bar No. 404522  
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**ATTORNEYS FOR PLAINTIFF**

# EXHIBIT A

EXHIBIT "A"

Number	Name	State	Incident Date
1	Adams/Esparza	California	5/10/78
2	Adams (Betty)	Texas	7/19/80
3	Adams (Rewis)	California	5/10/78
4	Alban Tractor	Maryland	
5	Allen	Texas	10/30/81 10/30/80
6	Alvarez	Texas	11/9/86
7-8	Anderson (Luther)	Michigan	6/20/78
9	Anderson (Robert)	Wisconsin	7/20/77
10	Armstrong	Arkansas	12/25/87
11	Arnold	Texas	6/21/91
12	Banks	Georgia	2/25/81
13	Bazan	Texas	8/8/88
14	Bell	Texas	10/3/87
15	Best	Tennessee	12/4/92
16	Bishop	Tennessee	5/7/91
17	Bocarski (Rassi)	California	9/5/92
18	Bollinger	Texas	4/6/79
19	Bono	Missouri	10/31/78
20	Bower	Texas	6/21/86
21	Bradley (Roundtree)	Texas	5/4/92
22	Bray	California	8/5/90
23	Brewer	Michigan	1/9/82 1/8/92

Number	Name	State	Incident Date
24	Burch	Texas	10/3/87
25	Burnstein	New Jersey	6/16/75
26	Bush, Daniel	Texas	9/19/92
27	Butler	Michigan	2/18/87
28	Calhoun, Charles	Ohio	
29	Calhoun, William	Ohio	7/7/80
30	Cameron, Mark	South Carolina	5/5/90
31	Cameron, Steve	South Carolina	5/5/90
32	Castoreva	Arizona	
33	Cavin	Michigan	5/22/87
34	Chapman	Illinois	6/31/81
35	Chipman, James	Tennessee	5/7/91
36	Christensen	Oklahoma	12/11/73
37	Clifton	Michigan	4/19/78
38	Clouse	Missouri	9/30/83
39	Cockrum	Kansas	10/29/92
40	Colmenares	California	6/23/89
41	Cook	Oklahoma	9/13/88
42	Corbin, Richard	Washington	8/1/92
43	Costello	California	12/15/89
44	Covarrubias	Texas	10/16/88
45	Cravahlo	California	7/1/90
46	Cresswell, Jerry	Texas	7/13/79
47	Coryell	Texas	8/29/91
48	Curren	Ohio	7/7/80

Number	Name	State	Incident Date
49	Dale, Cleveland	Louisiana	9/20/92
50	De Las Santos	California	12/29/89
51	Dibble, Kenneth	Arizona	11/18/91
52	Dison	Louisiana	7/8/84
53	Dixon	Mississippi	6/14/88
54	Dobbs	Mississippi	3/11/88
55	Draper	Arizona	11/19/92
56	Dugan	California	8/7/80
57	Dupuy	California	6/12/85
58	Ellis	Mississippi	5/11/86
59	Faz	Texas	3/1/92
60	Fenton, Shane (Hilbig)	Texas	3/1/92
61	Fite, Harold (Chalmers)	Montana	8/2/79
62	Flennory	Texas	2/4/77
63	Frank, James	Texas	3/27/77
64	Funkey, Jim	Colorado	12/19/89
65	Gagnon, Raymond	California	9/5/92
66	Garcia	California	3/30/78
67	Gibson	Indiana	4/8/85
68	Gold	Michigan	4/19/78
69	Goldsboro	Georgia	2/1/88
70	Goody	Texas	4/11/92
71	Grams	Arizona	11/25/81
72	Greenway	Arizona	4/2/80

Number	Name	State	Incident Date
73	Gregory	Tennessee	11/3/87
74	Griffin	Florida	2/17/80
75	Guadagni	California	7/1/90
76	Hamby	Oklahoma	4/10/89
77	Harris, Anthony	Tennessee	9/3/89
78	Harris, Lynne	Kansas	9/20/77
79	Harris, Martin (Woods)	Kansas	9/20/77
80	Hart	Florida	4/9/77
81	Hawkins	Massachusetts	1/1/85
82	Hensley	California	8/5/87
83	Herrara	Texas	10/16/88
84	Hoppe	Michigan	6/20/80
85	Horner, J. (Dugan)	California	8/7/80
86	Horowitz (Burnstein)	New Jersey	6/16/75
87	Horton	Michigan	
88	Howard	Indiana	
89	Hudson	Wisconsin	
90	Hunt, Jack	Texas	3/4/85
91	Huston	Michigan	4/19/78
92	Hymes	New York	3/25/79
93	Ice, Donald	Oklahoma	7/26/85
94	Isenberg	California	11/21/86
95	Jackson	Alabama	2/5/86
96	Jacobson	New York	1/25/86

Number	Name	State	Incident Date
97	Johnson, Mary	Texas	8/14/89
98	Johnson, Virginia	Alabama	1/27/91
99	Johnston	California	9/4/85
100	Joyce	Texas	11/3/81
101	Kasper, Doyle		2/1/92
102	Kinney, Charles	Ohio	8/20/87
103	Kiousis	South Dakota	6/20/92
104	Kline, Frances	Oklahoma	10/16/77
105	Krug, Walter	Texas	11/25/91
106	Laing, Stephen	Texas	1/8/91
107	Langham	Texas	11/24/90
108	Laskowski	Illinois	8/28/75
109	Leach	Michigan	4/19/78
110	Lemay, Arland	California	12/20/89
111	Leu		4/22/79
112	Luntz	Texas	3/11/88
113	Maki	New Jersey	6/16/75
114	Marchan	Texas	6/21/86
115	Marlow, Ernest	Georgia	6/19/90
116	Martin	Maryland	6/17/85
117	Mason, Tony		7/6/88
118	McGarity	California	11/21/86
119	McKellar	Mississippi	7/4/91
120	McManus, George	Texas	8/29/91
121	McRae	Texas	

Number	Name	State	Incident Date
122	Mercer, Steven	Mississippi	9/21/90
123	Milane, Lolita	New Mexico	6/19/90
124	Miller	Illinois	6/24/78
125	Miranda	Texas	6/21/86
126	Mora, John	Texas	4/26/91
127	Morningstar, Marvin	Kansas	3/22/87
128	Moseley	Georgia	10/21/89
129	Murray, John	Texas	1/5/91
130	Murray and Wilson	Maryland	11/17/87
131	Nitcholas, David (Langham)	Texas	11/24/90
132	Nolls	Mississippi	5/11/86
133	Norrick		
134	O'Keefe	New York	1/13/87
135	Overly	Pennsylvania	11/17/84
136	Page	Texas	5/15/80
137	Parham	California	1/21/80 1/21/80
138	Parkhill	Oklahoma	8/8/88
139	Parks	California	11/21/86
140	Parrish, William (Powell)	Virginia	6/26/88
141	Payton, Mikeil	Mississippi	12/4/87
142	Piercefield, Michael	Texas	1/26/91
143	Pipple	Illinois	6/31/81

Number	Name	State	Incident Date
144	Pollan, Jeanne	Texas	10/10/90
145	Porterville Concrete	California	
146	Ramirez, Sophia	California	10/4/87
147	Rassi	California	9/5/92
148	Ramos, Julian	Texas	12/21/90
149	Reed	Kansas	2/15/84
150	Resendez	Texas	12/24/79
151	Rice, Phillip	Maryland	6/24/78
152	Rideout	Oregon	6/12/91
153	Ridgeway, James	Arkansas	1/25/93
154	Ridley, Harry	Florida	4/16/89
155	Ritter, Chad	Texas	10/10/90
156	Romine	Florida	12/24/76
157	Sanchez, Samuel, Jr.	Texas	10/3/92
158	Sanders, James (Baker)	Oklahoma	11/16/91
159	Santus, Thomas	Indiana	8/3/91
160	Schaefer, Peter		4/21/90
161	Schmidtendorff	Indiana	4/28/89
162	Scott	Texas	6/21/86
163	Segers	Kansas	9/20/77
164	Shafer	Wisconsin	
165	Shogren (Goldsboro)	Georgia	2/1/88
166	Short	Kentucky	11/13/92

Number	Name	State	Incident Date
167	Shwope	Georgia	
168	Siebs, Calvin	Arkansas	10/16/89
169	Silva	California	
170	Slade	Illinois	5/29/82
171	Sloan-Newsome	Ohio	10/14/90
172	Smith, Ernest	Georgia	12/5/73
173	Smith, Judy	Louisiana	4/15/83
174	Smithey	Oklahoma	10/16/77
175	Spratling	Georgia	2/17/77
176	Stankevicz	Minnesota	4/9/77
177	Staples	California	6/23/74
178	Steinmetz	Pennsylvania	8/7/87
179	Stevens	California	5/8/92
180	Stiff	Alabama	7/12/85
181	Swanson	Louisiana	4/15/83
182	Tapia	Texas	3/20/89
183	Taylor	California	12/17/77
184	Tracy	Michigan	9/25/82
185	Trautman	Florida	7/26/80
186	Triplett	Oklahoma	12/11/73
187	Trolenberg, Paul	Illinois	12/6/90
188	Tyler	California	3/31/82
189	VadeBancoeur	Illinois	8/28/77
190	Vaughn, Eddie (Dobbs)	Missouri	3/11/88
191	Vergera	Texas	8/9/89 8/9/90

Number	Name	State	Incident Date
192	Vollmer	Texas	3/31/76
193	Wadsworth	Alabama	2/8/92
194	Wallace	Alabama	7/12/85
195	Walters, David	Pennsylvania	10/3/92
196	Ward	Florida	
197	Warmbrodt, John	Missouri	12/3/90
198	Watt, John	Tennessee	11/25/90
199	Weathers, Phyllis		5/30/84
200	Whitlow	Washington	4/19/87
201	Wiggins	Texas	8/17/84
202	Wildeboer, Jonathan	South Dakota	6/20/92
203	Wilhite	Texas	3/31/79
204	Williams, Dale (Pattie)	Texas	8/21/81
205	Williamson	Pennsylvania	11/9/86
206	Wilson, Don	Oklahoma	10/28/92
207	Wilson, Robert		2/6/90
208	Wise	Michigan	6/20/78
209	Witt	Montana	4/22/90
210	Wood	Vermont	11/2/73
211	Woods, Brady	Texas	8/14/89
212	Woods, Charley	Kansas	9/20/77
213	Woods, Rosemary	Kansas	
214	Woods, Ruthie	Texas	
215	Worden, Douglas	Washington	11/3/92

Number	Name	State	Incident Date
216	Yarbrough	Michigan	5/11/86
217	Zelenuk, Francis	Texas	6/03/89
218	Mercado	Florida	2/17/92
219	Cooper	New Hampshire	
220	Gruce	Florida	4/29/75
221	Richards	Maryland	11/1/75
222	Sherman	Texas	1/23/76
223	Kinden		2/17/76
224	McNair	Mississippi	4/3/76
225	Doud	Texas	7/22/76
226	Strongheart	South Dakota	10/10/76
227	Patin	Louisiana	11/25/76
228	Carter	Oklahoma	12/27/75
229	Harrison	New Hampshire	2/3/77
230	Prince Chevrolet	Georgia	4/11/77
231	Neal	Louisiana	7/8/77
232	Weems	Louisiana	8/12/77
233	Lihue Motors	Hawaii	5/19/77
234	Montpeller	Mississippi	9/11/77
235	Feenstra	Georgia	12/22/77
236	Reagan	Tennessee	1/12/78
237	Wilkerson	Florida	2/7/78
238	Miles	Alabama	10/4/78
239	Dryman	Texas	8/16/78
240	Lee	Arizona	3/9/79
241	McGinnis	Ohio	4/7/79

Number	Name	State	Incident Date
242	McCool	Indiana	10/17/79
243	Ubane		9/30/83
244	Chanez		6/19/83
245	Huggins	Georgia	9/15/77
246	Dixon	Mississippi	10/28/78
247	4 Flg Mtr Co.	Illinois	1/11/79
248	Modgan Chev.	Virginia	3/20/79
249	Hausman	New York	11/17/79
250	Gillette	Georgia	3/26/75
251	Simmons	Texas	7/10/76
252	Carroll	Georgia	9/20/76
253	Cerda	Texas	7/21/76
254	Pugh	North Carolina	12/7/76
255	Humphrey	W. Virginia	5/8/75
256	McCrey	Illinois	5/21/77
257	Coatney	Florida	11/5/77
258	Brennan	New York	2/26/77
259	Moon	Texas	1/30/79
260	Thacker	Virginia	2/11/79
261	Albert	Virginia	11/12/78
262	Helguin	Texas	3/2/82
263	Ryder Truck	Texas	5/15/82
264	Carlson	Washington	12/23/77
265	Effie	Kansas	11/20/77
266	Wagers	Kentucky	2/21/79
267	Imhoff	Iowa	4/4/78
268	Seibs	Arkansas	10/16/89

Number	Name	State	Incident Date
269	Vergara	Texas	8/9/89
270	Beck	Nevada	2/21/89
271	Godoy	Texas	4/11/92
272	Chavez	California	8/12/91
273	Conely	Minnesota	6/20/81
274	Coreale	Georgia	4/30/89
275	Schmidtendorr	Indiana	4/28/89
276	Herring	Texas	4/3/88
277	Foster		5/30/91
278	Franke	Iowa	1/23/84
279	Giraud		2/26/90
280	Holden	Wisconsin	11/15/86
281	Martinez	Texas	9/30/90
282	McIrvin		6/1/84
283	Ramirez	Texas	10/4/87
284	Reynolds		11/21/90
285	Roman		9/2/90
286	Schonberg		11/22/86
287	Schlepp	Kansas	3/28/87
288	Chalmers	Michigan	8/2/79
289	Flenory	Texas	2/4/77
290	Gentille	Pennsylvania	5/15/89
291	Brady	Michigan	1/14/93
292	Hannah	Arizona	5/20/90
293	LeClair	New Hampshire	10/20/92
294	Motes	South Carolina	10/11/92
295	Nichol	Oklahoma	3/14/89

Number	Name	State	Incident Date
296	Ruskin		11/6/92
297	Stephens		5/8/92
298	Wilson	Oklahoma	7/27/90
299	Wilborn	Kentucky	11/21/92
300	Johnson	Connecticut	6/4/85
301	Pattie	Texas	8/21/81
302	Cormier	New Hampshire	12/26/92
303	Gaubert	Louisiana	2/26/93
304	Harless	Texas	9/20/92
305	Sturdivant	Tennessee	8/10/84
306	Adcock		10/21/93
307	Roundtree	Texas	5/4/92
308	Almanza	Texas	7/6/91
309	Bartu	Oregon	10/22/91
310	Bishop	Oklahoma	11/3/93
311	Bowles	North Carolina	4/18/93
312	Bryant	Michigan	1/1/93
313	Buie	Kansas	5/26/91
314	Buster	Texas	5/8/93
315	Chelf	Texas	10/20/91
316	Clayton	Missouri	1/27/90
317	Cortes		8/8/92
318	Cruz	Texas	1/16/88
319	Darling	Indiana	7/19/92
320	Davis/Becker		11/9/92
321	Diermann	Missouri	3/29/89
322	Doe	Florida	

Number	Name	State	Incident Date
323	Dorsey		
324	Egyed	Ohio	4/9/93
325	Edlin	Indiana	8/14/88
326	Elwood		6/16/82
327	Falcon	Louisiana	4/30/88
328	Fitzgibben	Texas	10/12/93
329	Fletcher	Indiana	2/1/93
330	Flores	Florida	7/3/93
331	Galvan	Virginia	11/5/91
332	Gonzalez		7/31/93
333	Halas	Texas	2/27/86
334	Hamby	Michigan	9/21/91
335	Hatter	Oklahoma	11/1/93
336	Hazel	Kentucky	4/8/88
337	Thoma		9/10/92
338	Hernandez	Arizona	6/18/91
339	Herrera	California	7/27/93
340	Hershey		9/21/93
341	Hunt	Ohio	2/11/88
342	Jones	Oregon	7/7/90
343	Joy	Arizona	9/8/79
344	Klarlund	Missouri	7/20/93
345	Klingman	Wisconsin	7/28/87
346	Baker	Illinois	5/26/90
347	Konkol	Washington	2/26/93
348	Landrum	Oklahoma	6/1/93
349	Threadgill	Mississippi	12/13/87

Number	Name	State	Incident Date
350	Law	Louisiana	11/19/92
351	League	Texas	1/21/88
352	Lev	Pennsylvania	
353	Lovett	Nevada	7/13/90
354	Reeder	Indiana	1/7/94
355	McKee	Virginia	11/20/92
356	Meadors	Texas	11/27/93
357	Medina	New York	11/20/92
358	Mendoza	California	5/28/87
359	Bode	Illinois	6/16/93
360	Moretz	Virginia	3/5/93
361	Mullins		3/13/85
362	Martin		8/29/87
363	Norton		7/8/93
364	Norton		10/25/88
365	Palacios	7/18/83	
366	Perez	Nevada	7/27/88
367	Perez	California	1/29/88
368	Peterson	Washington	6/7/91
369	Phillips	North Carolina	7/11/93
370	Pomeroy	Ohio	3/12/91
371	Racine	Connecticut	10/5/91
372	Ricks	Texas	5/17/92
373	Riley	Kansas	9/2/88
374	Robertson	Kentucky	12/16/92
375	Salce	California	8/20/93
376	Schick	Oregon	5/26/82

Number	Name	State	Incident Date
377	Smith	Kentucky	11/13/92
378	Smith	Indiana	12/18/93
379	Straube	Texas	3/17/90
380	Sturtevant		8/26/92
381	Todd	Michigan	10/29/90
382	Tschanz	Ohio	3/13/93
383	Tso	Arizona	9/28/87
384	Vara	Texas	8/7/91
385	Vasquez		3/27/92
386	Waterman	Michigan	11/22/85
387	Weymouth	Virginia	6/22/92
388	Saucier	Florida	12/29/91
389	Tompkins	New York	4/11/89
390	Timmerman	Texas	5/7/90
391	Costamanga		11/22/80
392	Brown	Georgia	11/20/75
393	Devillier	Louisiana	8/3/75
394	Liebfried		5/18/75
395	Armitage		10/21/75
396	Talley	Florida	7/7/76
397	Henderson		10/18/76
398	Shafer		8/19/76
399	Frank	Arizona	4/2/77
400	Tennyson		4/10/77
401	Wilson		7/31/77
402	Fritschel	Illinois	4/29/77
403	Elms	Indiana	9/30/77

Number	Name	State	Incident Date
404	Givens		2/7/77
405	Page		6/25/77
406	Sharp	Missouri	12/6/77
407	Demmith	Wisconsin	8/17/77
408	Bullard		8/25/78
409	Reavis	Georgia	11/17/78
410	Pettit	Illinois	8/29/78
411	Guenther	Illinois	10/2/78
412	Hartley	Indiana	8/2/78
413	Sturgill	Kentucky	9/21/78
414	Gayheart		10/26/78
415	Trione	Oregon	7/21/78
416	Mullins	Indiana	5/7/78
417	Hendrix	Tennessee	8/15/78
418	Daniel	Texas	4/16/78
419	Kuvet	Texas	9/25/78
420	Baldasare	Washington	9/16/78
421	Turpin	W. Virginia	1/19/78
422	King		4/22/79
423	Chapman		10/13/79
424	Rory	Illinois	8/25/79
425	Bartholomew		10/3/79
426	Harris	New Jersey	11/10/79
427	Hill	Texas	10/26/79
428	Schneller	Arizona	9/11/80
429	Eagar		7/14/80
430	Price		10/29/80

Number	Name	State	Incident Date
431	Gilmore	Louisiana	8/12/80
432	Barthel		7/24/80
433	Johnson		12/24/80
434	Fox		7/6/80
435	Brothers		7/3/80
436	Long	Ohio	11/1/80
437	Ramsay	Texas	3/20/80
438	Herrara	Arizona	2/28/81
439	Franklin	Arizona	10/24/81
440	George		11/10/81
441	Boyle	Illinois	6/15/81
442	Zabel	Kansas	11/9/81
443	Gregory		2/18/81
444	Amundson		10/10/81
445	Winstead	1/10/81	
446	Richardson	Texas	10/23/81
447	Stanfield	Texas	12/9/81
448	Halterman	Illinois	6/21/82
449	Hamilton	Kentucky	9/6/82
450	Gray		1/16/82
451	Dornhoff		3/21/82
452	Glass		3/12/82
453	Champagne	Florida	2/6/83
454	LaPointe	New Hampshire	9/3/83
455	Davis	New York	2/24/83
456	Thompson	South Dakota	11/12/83
457	Key	Texas	3/8/83

Number	Name	State	Incident Date
458	Seale	Texas	4/23/83
459	McCabe	Texas	7/30/83
460	Wells	Michigan	11/30/84
461	Yarger	Missouri	10/2/84
462	Schadegg		9/4/84
463	Sheppard	New Jersey	4/3/84
464	Phillips	North Carolina	9/16/84
465	Schumaker	Tennessee	2/11/84
466	Laughlin		1/23/84
467	Cathey	Texas	8/26/84
468	Kircher		9/20/85
469	Royer		9/27/85
470	Smith	Florida	1/12/85
471	Price		9/23/85
472	Milligan	Maryland	4/27/85
473	Stone	Missouri	10/17/85
474	Edwards	Texas	8/28/85
475	Boothe	Texas	10/18/85
476	Manns	Virginia	4/3/85
477	Mahenski		3/16/88
478	Disney	Kentucky	1/10/88
479	Glasgow	North Carolina	3/5/86
480	Yuttermen	Oklahoma	9/8/86
481	Roy	Missouri	1/16/87
482	Flint	Missouri	7/16/87
483	Walton		9/24/87
484	Haire		10/18/87

Number	Name	State	Incident Date
485	Ketchum	Texas	2/18/87
486	Lewis	Alabama	6/14/88
487	Chandler		3/24/88
488	Hester		4/28/88
489	Huddleston	Maryland	4/28/88
490	Gunderson		8/29/88
491	Sammons		8/24/88
492	Stutts		4/1/88
493	Clayborn	Texas	8/19/88
494	Guerrero	Texas	9/13/88
495	Bennett	W. Virginia	7/11/88
496	Kelly	Florida	3/19/89
497	McLaughlin	Louisiana	3/14/89
498	Traudt		4/27/89
499	Franklin	Texas	4/8/89
500	Irvin	Texas	4/5/89
501	Hering	Texas	10/22/89
502	Taylor	W. Virginia	3/9/89
503	Matlock	Louisiana	7/29/90
504	Andella		8/28/90
505	Deckard	Missouri	5/30/90
506	Morgan	Missouri	8/5/90
507	McConnell	Missouri	10/10/90
508	Clay	Ohio	1/18/90
509	Latshaw	Pennsylvania	7/28/90
510	Swisher	Texas	5/4/90
511	Ybarra	Texas	9/21/90

Number	Name	State	Incident Date
512	Hunt		1/1/90
513	Perfitt	Michigan	9/20/92
514	Frazer		8/18/92
515	Lowe	W. Virginia	12/29/92
516	Rusher		1/18/93
517	Marden	Utah	7/15/92
518	Rivere	Louisiana	4/29/92
519	Castellano	Florida	8/30/93
520	Moon		7/8/88
521	Polk	Alabama	3/13/91
522	Eastman	Arizona	6/13/91
523	Ogden	Oklahoma	9/14/75
524	Castillo	Texas	10/10/75
525	Haggitt	Michigan	4/23/76
526	Freeland	Kansas	11/29/76
527	Petree	Texas	6/18/77
528	Saxon	Oklahoma	8/24/78
529	Pugh	Oklahoma	12/2/78
530	Weber		11/18/79
531	Walbridge	Iowa	8/4/79
532	Collins	Oklahoma	8/9/80
533	Tucker	Texas	4/27/80
534	Punches	Wisconsin	4/21/80
535	Doe	Missouri	11/29/81
536	King	Oklahoma	2/12/81
537	Nichols	Oklahoma	8/11/81
538	Schwarck	Texas	6/2/81

Number	Name	State	Incident Date
539	Fox		5/8/82
540	Gouge	Oklahoma	7/15/83
541	Bourque	Lousiana	5/20/84
542	Stephens	Tennessee	12/28/84
543	Anderson	Texas	9/6/84
544	Kruk	Illinois	2/11/85
545	Williams	Missouri	8/18/85
546	Bisson	New Hampshire	6/2/86
547	Andrews	Pennsylvania	7/29/89
548	Holcomb		1/4/90
549	Koppal	Florida	8/20/90
550	Cheek		10/11/79
551	Gibson	Missouri	9/7/79
552	Millwee	Texas	6/13/79
553	Connolly		8/18/80
554	Rosalez	Oklahoma	3/11/84
555	Starkey	Oklahoma	7/19/85
556	Lanier	Alabama	11/7/81
557	Wirth		8/22/81
558	Thibodeaux	Louisiana	7/6/82
559	Peach	Tennessee	2/6/82
560	Lingren		12/12/82
561	Monceaux	Louisiana	10/8/84
562	Bull		11/9/85
563	Glaspie	Texas	8/30/86
564	Kusser	South Dakota	10/22/78
565	Shores		9/29/79

Number	Name	State	Incident Date
566	Crawford	Kansas	2/4/79
567	Vickers	Mississippi	10/1/79
568	Heck		5/17/80
569	Stickley		2/2/80
570	Gilbertson		9/13/80
571	Dickerson	Missouri	10/31/80
572	Nathurst	Florida	11/20/81
573	Loe	Louisiana	1/15/81
574	Gurzan	Texas	3/6/82
575	Somers		5/12/83
576	Graves		9/2/83
577	Feight	Kansas	11/23/84
578	Cornett	Tennessee	7/4/84
579	Piazza		8/24/85
580	Sauerwein	Kansas	9/30/85
581	Gilmore	Michigan	10/13/85
582	Grahek		6/30/85
583	Plank	Nevada	1/22/86
584	Kiefer	Oklahoma	1/22/86
585	Blair	Michigan	9/12/87
586	Riley		7/11/88
587	Haney	North Carolina	10/28/88
588	Rachui	Texas	7/28/88
589	McChesney	Texas	8/4/88
590	Slagel	Illinois	6/10/89
591	Engle	Indiana	1/9/89
592	Herbison	Kansas	6/22/89

Number	Name	State	Incident Date
593	Matera	Texas	3/13/91
594	Silva	Texas	9/26/93
595	Smith		7/20/93
596	Hayes	Tennessee	9/11/93
597	Jeschke		11/28/92
598	Galvez		
599	Bailey	Washington	8/27/90
600	Tapp	Wisconsin	11/8/85
601	Ross	W. Virginia	12/11/88
602	Pollock		4/18/85
603	Dollar	Louisiana	9/29/88
604	Copland	Illinois	7/11/73
605	Bouska	Michigan	6/14/74
606	Whetstine	Oregon	2/19/76
607	Lynch	Texas	11/24/93
608	Eberhardt		5/19/88
609	Desmond	New York	7/21/88
610	Caldwell		
611	Shoemake		
612	Lacy		9/1/93
613	Pinkerton		9/11/28
614	Scalise	Illinois	3/14/93
615	Hannah	Pennsylvania	2/16/94
616	Cortez	Texas	3/8/94
617	Hawkins	Alabama	1/30/94
618	Lindahl	Michigan	7/14/93
619	Singer	New Mexico	9/5/93

Number	Name	State	Incident Date
620	Ohara	Ohio	1/20/94
621	Faut	Nevada	3/10/94
622	Vann	Alabama	2/12/94
623	Schinzel	Florida	6/29/75
624	Trobaugh		4/11/94
625	Clark	Texas	11/13/93
626	Blake	Arizona	6/10/79
627	James	Ohio	3/3/89
628	Wiseman	Missouri	4/17/94
629	Webber	Texas	10/16/85
630	Shope	Georgia	10/23/93
631	Ake	New York	9/24/93
632	Liechty	Iowa	7/5/76
633	Hunt	Texas	1/1/89
634	Lamkey	Missouri	9/21/94
635	Jackson, J.		
636	Turbeville	Florida	10/9/94
637	Sumner		
638	Gabaldon		4/17/94
639	Baker, C.	Wisconsin	6/26/93
640	Autenrieth	California	4/5/94
641	Baran, M.	Illinois	11/24/95
642	Bass, D.	Oklahoma	4/9/94
643	Bragg, J.	North Dakota	10/4/94
644	Claasen, J.	Iowa	11/6/93
645	Gribat, H.	Illinois	6/11/94
646	Glass, C.	Michigan	6/6/95

Number	Name	State	Incident Date
647	Davis, W.	Texas	12/6/94
648	Feeaney, M.	South Carolina	1/6/95
649	Fort, H.	Oregon	8/14/94
650	Fowble, M.		
651	Garza, E.	Texas	12/1/92
652	Hack, J.		
653	Hernandez, J.		
654	Jones, C.	Oklahoma	1/13/95
655	Anderson, M.	Texas	10/24/94
656	Mundy, F.	Oklahoma	2/22/95
657	Simpson, D.	California	12/14/94
658	Caption	New York	2/18/95
659	Wilson, J.	New Mexico	2/27/94
660	Lash, J.	Illinois	12/16/94
661	Hanna	South Carolina	10/22/75
662	Devillars, W.	California	5/5/95
663	Dorman, O.	Washington	4/21/95
664	Vaughn	Missouri	7/10/96
664	Kearns		7/28/96
665	Milner		
666	Doniaz		
667	Blanton		8/3/96
668	Frausto		2/7/96
669	Sawyer		4/25/96
670	Yanowski		8/1/96
671	Godby		12/9/96
672	De Cortes		

Number	Name	State	Incident Date
673	Williams		8/31/96
674	Flippo		
675	Shudiak		
676	Linck		
677	Doran		1/21/97
678	Turner		
679	Gilbert		
680	Burns		
681	Faircloth		
682	Zion		
683	Arrizabalgo		
684	Wales, W.		
685	Labor		
686	Dorough		
687	Hilburn		
688	Sandoval	California	10/2/95
689	Marty	Texas	12/2/95
690	Smith	Tennessee	4/2/92
691	Sparacino	Texas	4/19/86
692	Bean	Texas	9/28/84
693	Brown	Alabama	1/24/85
694	Degroot	Minnesota	6/10/86
695	Granados	California	11/23/87
696	Durocher	Louisiana	10/20/87
697	Nelson	Mississippi	8/20/87
698	Slusser	Louisiana	10/4/88
699	Mann	Texas	10/17/92

Number	Name	State	Incident Date
700	Beeson	South Dakota	6/17/95
701	Curtis	Tennessee	11/17/94
702	Seebeck	Georgia	7/15/95
703	Anderson	Texas	9/18/95
704	Desylva	Oklahoma	6/2/95
705	Henrie	Pennsylvania	7/29/93
706	Smith	Texas	11/11/93
707	Osredkar	Michigan	9/17/95
708	Kibby	Michigan	1/3/96
709	Reynard	Canada	8/1/94
710	Dalton	Georgia	10/8/95
711	Hartman	Washington	12/9/95
712	Wolfe	Michigan	11/23/95
713	Landry	Alabama	1/1/94
714	Dutton	Georgia	3/9/92
715	Meyers/Hurt	North Dakota	12/24/93
716	Connelly/ Johnson	Washington	12/21/89
717	Richardson	Louisiana	11/20/92
718	Howard		5/6/75
719	Decker	Tennessee	11/17/94
720	Thompson	Maryland	11/17/94
721	Zygmunti	Illinois	11/24/94
722	Evans	Florida	11/12/82
723	Eastridge	Texas	11/27/93
724	Youngblood		4/20/84
725	Marquez	Texas	7/18/83

Number	Name	State	Incident Date
726	Neufeld	Oklahoma	5/31/96
727	Ellen	Arizona	10/23/89
728	McComas	Oklahoma	
729	Douglas	California	5/21/97
730	Barnes	South Carolina	8/31/96
731	Peterson	Kansas	10/14/96
732	Allen, T		
733	Anderson, J.		
734	Anthony Crane Rental		
735	Antoncich, C		
736	Ball, S.		
737	Barker, R.		
738	Bingham, W.		
739	Bird, W.		
740	Birtch, K.		
741	Brewer, L.		
742	Brock, D.		
743	Carter, S.		
744	Chilcoat, J.		
745	City of Calgary		
746	Clark, H.		
747	Costa, M.		

Number	Name	State	Incident Date
748	Demeritt, C.		
749	Doe, J.		
750	Ehmann, G.		
751	Erikson, S.		
752	Floral Design		
753	Garey, J.		
754	Graves, F.		
755	Guevara, A.		
756	Gutierrez, H.		
757	Harvey, T.		
758	Hearn, R.		
759	Hernandez, E.		
760	Jones, B.		
761	Jones, J.		
762	MacNevin, D.		
763	McGarrah, M.		
764	McGuire, B.		
765	Mendoza, M.		
766	Miller, W.		
767	Moore, K.		
768	Rios, R.		
769	Rogers, D.		
770	Screen, S.		

Number	Name	State	Incident Date
771	Seguin, J.		
772	Shiring, E.		
773	Shults, G.		
774	Smith, M.		
775	Squirer, R.		
776	Stevens, N.		
777	Tackett, R.		
778	Taylor, R.		
779	Wagner, G.		
780	Wotherspoon, C.		
781	Young, R.		
782	Zembrzycki, O.		

# EXHIBIT B

C/K TRUCK INCIDENT LIST BY INCIDENT NAME

Case/Matter Name	Make	Model Year	Incident Date	Incident State/Province
ALEXANDER GARY R				
ALLEN TONI	Chevrolet	1978	11/29/1997	Texas
ALLEN WAYNE	Chevrolet	1985	10/04/2001	Texas
ANTHONY CRANE RENTAL	Chevrolet	1984	04/14/1998	Texas
ANTONCICH CYNTHIA A	Chevrolet	1987	04/14/1995	New York
ARCOS SANTIAGO DAVILA	GMC	1983	08/03/2003	
ARGUELLO JUAN JR	Chevrolet	1979	08/25/2001	Texas
AVERY THOMAS	GMC	1979	03/01/1999	Louisiana
AYALA MIGUEL GUTIERREZ	Chevrolet	1981	09/23/2000	
BANKS BRIAN	Chevrolet		04/10/2000	Tennessee
BARKSDALE KENNETH H	Chevrolet	1980	02/26/1997	
BARNEY LASHONDREKA	Chevrolet	1983	02/12/2014	Georgia
BENBOW BARRY L	Chevrolet	1986	05/09/2000	Washington
BENNETT JON	GMC	1982	10/24/2003	New Hampshire
BINGHAM WARREN			07/29/1984	
BIRTCHE KEN	Chevrolet	1974	07/04/1980	
BOLDING KENNETH	Chevrolet	1983	01/31/1999	Oklahoma
BRAZELL BRENDA R	Chevrolet	1987	11/11/2012	South Carolina
BREWER LATOSHA MICHELLE	GMC	1980	03/23/1999	Tennessee
BYRD ANGELA	Chevrolet	1985	12/22/1997	Kansas
BYRD DARRELL L	Chevrolet	1985	12/22/1997	Kansas
BYRD SAMUEL	Chevrolet	1985	12/22/1997	Kansas
BYRD TIMOTHY	Chevrolet	1985	12/22/1997	Kansas
CALDWELL NICKEI	Pontiac	2005	04/25/2014	Arkansas
CALGARY CITY OF	Chevrolet	1977	10/26/1981	
CANADA - JOHN DOE	Chevrolet	1984		
CASTANEDA HERIBERTO CORTERO	Chevrolet	1981	09/23/2000	
CASTEEL AMANDA KATHLEEN	Chevrolet	1986	03/20/1999	Texas
CASTILLO ERNEST	Chevrolet	1974	06/19/1999	California
CHAMBERLAIN BRIAN J	Chevrolet	1978	04/02/2000	Oklahoma
CHEN SHI PIN	Chevrolet	1981	09/10/2000	Kansas
CHEN SHI PIN 2D ACTION	Chevrolet	1981	09/10/2000	Kansas
CLARK HAMPTON WADDELL	Chevrolet	1981	10/25/1997	Arizona
DAFFERN RUSSELL	Chevrolet	1984	07/03/1998	Texas
DELA TORRE FRANSISCO	GMC	1982	02/02/2003	Texas
DE LEON JOSE RODRIGUEZ	Chevrolet	1981	11/21/2002	Texas
DEW MARCUS R	GMC	1987	10/26/2000	Mississippi
DOE JOHN - LIVINGSTON MT - MAY 19	Chevrolet	1982	05/19/2001	Montana
DONZE REID HAROLD	Chevrolet	1987	11/11/2012	South Carolina
DOUGLAS JEANETTE	Chevrolet	1978	05/21/1997	Nevada
DOUGLAS THOMAS	Chevrolet	1978	05/21/1997	Nevada
ELLIOTT MICHAEL	Chevrolet	1985	11/11/1999	Tennessee
ELROD STERLING DREW	Chevrolet	1985	01/02/2002	Texas
ELROD STERLING DREW - ELROD CU	Chevrolet	1985		Texas
ERDMAN CORY	Chevrolet	1995	06/22/2003	Wisconsin

C/K TRUCK INCIDENT LIST BY INCIDENT NAME

Case/Matter Name	Make	Model Year	Incident Date	Incident State/Province
ERDMAN CORY - MULTI VEHICLE DUF	Chevrolet	1976	06/22/2003	Wisconsin
ERICKSON SHARON	Chevrolet	1977	11/04/1996	Oregon
FLESHER NOLAN	Chevrolet	1988	08/23/2002	California
FLORAL DESIGN	Chevrolet	1985	08/09/1994	
FOREHAND MARK A	Chevrolet	1987	07/21/2000	Wisconsin
FORTE ALLEN JR	GMC	1978	02/11/2000	Alabama
FOSTER PRINCE	Chevrolet	1981	04/15/2001	Texas
FOX PAUL D	Chevrolet	1978	10/14/1996	Kansas
FRANCO JAIRO ALAN	Chevrolet	1976	04/17/1994	
FULTON JUSTIN R	Chevrolet	1974	07/15/2001	Indiana
GALLAGHER ANTHONY M	Chevrolet	1984	05/26/2000	Montana
GALLAGHER CORRINA M	Chevrolet	1984	05/26/2000	Montana
GALLAGHER PATRICK K	Chevrolet	1984	05/26/2000	Montana
GALLAGHER THOMAS G	Chevrolet	1984	05/26/2000	Montana
GAREY JUSTIN R	Chevrolet	1984	05/06/1998	Florida
GARRETT STEPHEN	No Model			Colorado
GAUL DAVID	Chevrolet	1973	10/14/2002	Arizona
GILBERT WILLIAM CALVIN LAMAR JR	GMC	1986	08/25/2003	South Carolina
GILBERT WILLIAM CALVIN LAMAR JR	Chevrolet	1998		South Carolina
GILLIAM MATTHEW J	Chevrolet	1985	08/02/2002	Missouri
GOFFREDO JOSEPH VINCENT	Chevrolet	1982	07/19/2002	
GOOD MARY	Chevrolet	1979	08/30/1999	Arizona
GORDEN WILLIAM - GORDEN RACHE	GMC	1974	04/06/2003	Texas
GORDEN WILLIAM THOMAS	GMC	1974	04/06/2003	Texas
GRAY PETER	Chevrolet	1985	04/08/2000	Louisiana
GRiffin TODD	Chevrolet	1984	05/10/1999	Illinois
GRISHAM BRANDON	GMC	1977	02/12/2001	Texas
GUTIERREZ HUGO RAFAEL	Chevrolet	1982	08/20/1998	Texas
HACKER JOHN C	Chevrolet	1978	02/11/2003	Oregon
HAMELIN STEPHEN R	GMC	1979	08/30/1999	Arizona
HEARN ROBERT	Chevrolet	1981	01/20/1997	Mississippi
HERNANDEZ ERNEST G	No Model	1974	10/31/1997	Texas
HERNANDEZ RAYMUNDO R	Chevrolet	1987	01/22/2002	California
HERSHMAN GERALD	No Model			
HINDERKS BRICE P	Chevrolet	1987	06/02/2001	Missouri
HOLBROOK CHARLES	GMC	1978	07/19/1997	Kentucky
HONAKER BRADLEY	Chevrolet	1979	02/28/2001	Virginia
HOOVER JOHN	Chevrolet	1982	01/23/2001	Oklahoma
HOSE THOMAS DUANE	Chevrolet	1986	03/02/1998	Michigan
HUDELSON LINDA JEAN	Chevrolet	1985	03/05/1999	Arkansas
HUDIBURG CHEVROLET INC	Chevrolet	1987		
HUMPHREYS BRIAN	GMC	1986	05/10/2004	Pennsylvania
HUNT JAMES THOMAS JR.	Chevrolet	1984	11/30/1997	Texas
IVEY CANDIDO	GMC	1982	04/28/2005	Colorado
JAMESON SUMMER L	Chevrolet	1977	08/31/2003	Oregon

C/K TRUCK INCIDENT LIST BY INCIDENT NAME

Case/Matter Name	Make	Model Year	Incident Date	Incident State/Province
JONES BRIAN NELSON	GMC	1986	06/20/1997	Pennsylvania
JONES CARMEN	GMC	1986	01/24/1999	Louisiana
JONES JERALD	Chevrolet	1986	05/09/2000	Washington
JONES JERRY	GMC	1985	12/07/2002	Mississippi
KING TRUDY	Chevrolet	1984	07/13/2001	Kentucky
LANE DANIEL M	Chevrolet	1973	06/29/1998	Arizona
LANGE RICHARD				Ohio
LASICH JOSHUA	Chevrolet	1980	12/18/2001	Colorado
LAWRENCE ROBERT	Chevrolet	1978	03/26/2005	Oregon
LONERGAN TERESA	Chevrolet	1978	03/26/2005	Oregon
LOWRIE THERESA E	Chevrolet	1983	07/27/2013	Missouri
LYNCH SARAH HIATT	Chevrolet	1986	05/23/2000	Kentucky
MACNEVIN DAVID	GMC	1986	12/30/1994	Massachusetts
MAGANA MARY ESPINDOLA	GMC	1985	03/04/2000	Texas
MARTINEZ TORRES JOSE	GMC	1986	06/03/2002	Colorado
MASTERTON CLIFFORD SCOTT	Chevrolet	1985	10/03/2002	Florida
MCCLANAHAN TERRY				
MCCOY JAMES	Chevrolet	1984	10/24/2000	South Carolina
MCGARRAH MICHAEL JAMES	Chevrolet	1985	03/05/1999	Arkansas
MCGENSEY WILLIAM PAUL	Chevrolet	1982	10/06/2000	Texas
MCGUIRE BOB	GMC	1981	10/08/1992	Washington
MECK RACHEL J	Chevrolet	1980	08/09/1998	Pennsylvania
METCALFE TAMMY	GMC	1985	10/16/2002	Indiana
METZGER RONALD	Chevrolet	1981	10/01/2001	Michigan
MILLER WESLEY	Chevrolet	1981	01/18/1998	Michigan
MILLS JEREMY WAYNE	Chevrolet	1980	11/08/2004	Mississippi
MOORE EUGENE	GMC	1982		Louisiana
MOORE JERRY L	Chevrolet	1983	10/23/1997	Alabama
MOORE KENNETH IRVING	Chevrolet	1984	02/01/1997	Florida
MYERS WALTER	Chevrolet	1978	09/29/2012	Oklahoma
NELSON CARY MICHAEL	GMC	1979	03/24/2002	California
NEUFELD BRIAN	Chevrolet	1983	01/14/1995	
ODOM KEVIN	Chevrolet	1978	03/26/2005	Oregon
ODOM MICHAEL	Chevrolet	1983	01/10/2003	South Carolina
PATE JAMES D	Chevrolet	1986	04/04/2001	Alabama
RAINER PATSY	Chevrolet	1985	02/06/2001	Louisiana
RAMIREZ APOLINAR	Chevrolet	1981	05/19/2003	Texas
RESENDIZ MAURICIO	Chevrolet	1984	08/05/2000	Texas
RICHMAN LEFTY	Chevrolet		08/07/1998	Utah
RILEY SHAUN PATRICK	Chevrolet	1983	12/23/1998	Illinois
ROBERTSON JILL	Chevrolet	1978	08/18/2000	South Dakota
ROGERS DAN (SCHROEDER)	GMC	1980	05/31/1988	
ROURKE CHARLES	GMC	1983	03/15/1999	Louisiana
SALGAT RAYMOND	Chevrolet	1978	01/17/2001	Michigan
SAMUDIA JONATHAN	Chevrolet	1983	04/16/2003	Texas

C/K TRUCK INCIDENT LIST BY INCIDENT NAME

Case/Matter Name	Make	Model Year	Incident Date	Incident State/Province
SANCHEZ SAMUEL SR - 2D ACTION	No Model			
SANDOVAL JORGE	Chevrolet	1989	10/29/2000	Arizona
SCHANK EDWARD D	Chevrolet	1974	01/27/2000	Michigan
SCHILPP MONICA	Chevrolet	1985	07/02/1998	Missouri
SCOTT ADRIAN	GMC	1975	07/24/2002	Arkansas
SCOTT DARREN	Chevrolet	1973	03/18/2001	Oregon
SCOTT RICKY EARL	Chevrolet	1974	06/24/2003	Mississippi
SECOR CATHERINE	Chevrolet	1986	05/09/2000	Washington
SECRIST CASEY RAY	GMC	1983	11/29/2007	Illinois
SEGUIN JEAN JACQUES	Chevrolet	1980	07/01/1984	
SERRANO PRISCO J				
SESSIONS RONNIE G	GMC	1989	05/22/2001	Alabama
SHIRING E	Chevrolet	1985	11/01/1985	Pennsylvania
SHULTS GARY	Chevrolet	1985	08/21/1998	Colorado
SHUNIAK GEORGE JR	Chevrolet	1980	02/26/1987	Alabama
SMITH LANNIE	Chevrolet	1978	11/27/2000	Tennessee
SPRINGER PATRICIA	Chevrolet	1986	12/21/1998	California
SQUIER RUSSELL E	No Model	1978	07/08/1998	
STARRETT ROY CHARLES	Chevrolet	1981		
STEVENS NATHAN	Chevrolet	1975	03/26/1999	Georgia
TAFT BRIAN	Chevrolet	1986	11/12/2007	Pennsylvania
TAYLOR RONALD	GMC	1980	02/24/1989	
TEAGUE ROBERTA J	Chevrolet	1977	08/31/2003	Oregon
THORNTON MELISSA F	GMC	1979	04/07/2003	Missouri
TROLENBERG BRADLEY - PLUNKETT & GIBSON INC V TROLENBERG ETAL				
VERRY LYLE L	GMC	1984	07/17/2004	California
VESTAL CHARLES	Chevrolet	1983	04/05/2000	Missouri
VICTORY DONALD L	Chevrolet	1983	11/01/2003	Oklahoma
VILLANEUVA JOSE	Chevrolet	1983	05/15/2001	California
WADE LINDA	GMC	1980	02/29/2000	Oklahoma
WAGNER GORDON	GMC	1978	12/14/1978	
WAITE DANIEL	Chevrolet	1986	09/19/1997	Michigan
WILLIAMS AARON L	No Model		07/15/1995	Georgia
WILLIAMS COSTANZA		1983	02/12/2014	Georgia
WILLIAMS LINDA	Chevrolet	1983	02/12/2014	Georgia
WOTHERSPOON CALVIN	Chevrolet	1986		
YOUNG ROGER	Chevrolet	1984	11/27/1998	Texas
ZEMBRZYCKI OLGA	Chevrolet	1979	02/11/1985	
ZHENG ZI YI	Chevrolet	1981	09/10/2000	Kansas
ZHENG ZI YI 2D ACTION	Chevrolet	1981	09/10/2000	Kansas

## EXHIBIT C

EXHIBIT 1

Exhibit A No.			Response
1	Adams (Esparza)	California	Y
2	Adams (Betty)	Texas	Y
3	Adams (Rewis)	California	Y
4	Alban Tractor	Maryland	Y
5	Allen	Texas	Y
6	Alvarez	Texas	Y
7-8	Anderson (Luther)	Michigan	Y
9	Anderson (Robert)	Wisconsin	Y
10	Armstrong	Arkansas	Y
11	Arnold	Texas	Y
12	Banks	Georgia	Y
13	Bazan	Texas	Y
14	Bell	Texas	Y
15	Best	Tennessee	Y
16	Bishop	Tennessee	Y
17	Bocarski (Rassi)	California	Y (Duplicate)
18	Bollinger	Texas	Y
19	Bono	Missouri	Y
20	Bower	Texas	Y
21	Bradley (Roundtree)	Texas	Y
22	Bray	California	Y
23	Brewer	Michigan	Y
24	Burch	Texas	Y
25	Burnstein	New Jersey	N
26	Bush, Daniel	Texas	Y
27	Butler	Michigan	Y
28	Calhoun, Charles	Ohio	Y
29	Calhoun, William	Ohio	Y
30	Cameron, Mark	South Carolina	Y
31	Cameron, Steve	South Carolina	Y
32	Castoreva	Arizona	N
33	Cavin	Michigan	Y
34	Chapman	Illinois	Y
35	Chipman, James	Tennessee	N
36	Christensen	Oklahoma	N
37	Clifton	Michigan	Y
38	Clouse	Missouri	Y
39	Cockrum	Kansas	Y
40	Colmenares	California	N
41	Cook	Oklahoma	Y

Exhibit A No.			Response
42	Corbin, Richard	Washington	Y
43	Costello	California	N
44	Covarubias	Texas	Y
45	Cravahlo	California	Y
46	Cresswell, Jerry	Texas	Y
47	Coryell	Texas	Y
48	Curren	Ohio	Y
49	Dale, Cleveland	Louisiana	Y
50	De Las Santos	California	Y
51	Dibble, Kenneth	Arizona	Y
52	Dison	Louisiana	Y
53	Dixon	Mississippi	Y
54	Dobbs	Mississippi	Y
55	Draper	Arizona	Y
56	Dugan	California	Y
57	Dupuy	California	Y
58	Ellis	Mississippi	Y
59	Faz	Texas	Y
60	Fenton, Shane (Hilbig)	Texas	N
61	Fite, Harold (Chalmers)	Montana	Y
62	Flen[sic]ory	Texas	Y
63	Frank, James	Texas	Y
64	Funkley, Jim	Colorado	Y
65	Gagnon, Raymond	California	Y
66	Garcia	California	Y
67	Gibson	Indiana	Y
68	Gold	Michigan	Y
69	Goldsboro	Georgia	Y
70	Go[sic]d[o]y	Texas	Y (Duplicate)
71	Grams	Arizona	Y
72	Greenway	Arizona	Y
73	Gregory	Tennessee	Y
74	Griffin	Florida	Y
75	Guadagni	California	Y
76	Hamby	Oklahoma	Y
77	Harris, Anthony	Tennessee	Y
78	Harris, Lynne	Kansas	Y
79	Harris, Martin (Woods)	Kansas	Y
80	Hart	Florida	Y
81	Hawkins	Massachusetts	Y

## EXHIBIT 1

Exhibit A No.			Response
82	Hensley	California	Y
83	Herrara	Texas	Y
84	Hoppe	Michigan	Y
85	Horner, J. (Dugan)	California	Y
86	Horowitz (Bumstein)	New Jersey	Y
87	Horton	Michigan	Y
88	Howard	Indiana	N
89	Hudson	Wisconsin	Y
90	Hunt, Jack	Texas	Y
91	Huston	Michigan	Y
92	Hymes	New York	Y
93	Ice, Donald	Oklahoma	Y
94	Isenberg	California	Y
95	Jackson	Alabama	Y
96	Jacobson	New York	Y
97	Johnson, Mary	Texas	N
98	Johnson, Virginia	Alabama	Y
99	Johnston	California	Y
100	Joyce	Texas	Y
101	Kasper, Doyle		Y
102	Kinney, Charles	Ohio	Y
103	Kiousis	South Dakota	N
104	Kline, Frances	Oklahoma	Y
105	Krug, Walter	Texas	Y
106	Laing, Stephen	Texas	Y
107	Langham	Texas	Y
108	Laskowski	Illinois	Y
109	Leach	Michigan	Y
110	Lemay, Arland	California	Y
111	Leu		Y
112	Luntz	Texas	Y
113	Maki	New Jersey	N
114	Marchan	Texas	Y
115	Marlow, Ernest	Georgia	Y
116	Martin	Maryland	Y
117	Mason, Tony		Y
118	McGarity	California	Y
119	McKellar	Mississippi	Y
120	McManus, George	Texas	Y
121	McRae	Texas	N

Exhibit A No.			Response
122	Mercer, Steven	Mississippi	Y
123	Milane, Lolita	New Mexico	Y
124	Miller	Illinois	Y
125	Miranda	Texas	Y
126	Mora, John	Texas	Y
127	Morningstar, Marvin	Kansas	Y
128	Moseley	Georgia	Y
129	Murray, John	Texas	Y
130	Murray and Wilson	Maryland	Y
131	Nicholas, David	Texas	Y (Duplicate)
132	Nolls	Mississippi	Y
133	Norick		N
134	O'Keefe	New York	Y
135	Overly	Pennsylvania	Y
136	Page	Texas	Y
137	Parham	California	Y
138	Parkhill	Oklahoma	Y
139	Parks	California	Y
140	Parrish, William (Powell)	Virginia	Y
141	Payton, Mikeil	Mississippi	Y
142	Piercefield, Michael	Texas	Y
143	Pipple	Illinois	Y
144	Pollan, Jeanne	Texas	Y
145	Porterville Concrete	California	Y
146	Ram[sic]rez, Sophia	California (TX)	Y (Duplicate)
147	Rassi	California	Y
148	Ramos, Julian	Texas	Y
149	Reed	Kansas	Y
150	Resendez	Texas	Y
151	Rice, Phillip	Maryland	Y
152	Rideout	Oregon	Y
153	Ridgeway, James	Arkansas	Y
154	Ridley, Harry	Florida	N
155	Ritter, Chad	Texas	Y
156	Romine	Florida	Y
157	Sanchez, Samuel, Jr.	Texas	Y
158	Sanders, James (Baker)	Oklahoma	Y
159	Santus, Thomas	Indiana	Y
160	Schaefer, Peter		Y
161	Schmidtendorff	Indiana	Y

## EXHIBIT 1

Exhibit A No.			Response
162	Scott	Texas	Y
163	Segers	Kansas	N
164	Shafer	Wisconsin	Y
165	Shogren (Goldsboro)	Georgia	Y
166	Short	Kentucky	Y
167	Sh[sic]ope	Georgia	Y (Duplicate)
168	Siebs, Calvin	Arkansas	Y
169	Silva	California	Y
170	Slade	Illinois	N
171	Sloan-Newsome	Ohio	N
172	Smith, Ernest	Georgia	Y
173	Smith, Judy	Louisiana	Y
174	Smithey	Oklahoma	Y (Duplicate)
175	Spratling	Georgia	Y
176	Stankevicz	Minnesota	Y
177	Staples	California	Y
178	Steinmetz	Pennsylvania	N
179	Ste[ph]ens	California	Y
180	Stiff	Alabama	Y
181	Swanson	Louisiana	Y
182	Tapia	Texas	Y
183	Taylor	California	Y
184	Tracy	Michigan	Y
185	Trautman	Florida	Y
186	Triplett	Oklahoma	N
187	Trolenberg, Paul	Illinois	Y
188	Tyler	California	Y
189	VadeBancoeur	Illinois	Y
190	Vaughn, Eddie (Dobbs)	Missouri	Y (Duplicate)
191	Vergera	Texas	Y
192	Vollmer	Texas	Y
193	Wadsworth	Alabama	Y
194	Wallace	Alabama	Y
195	Walters, David	Pennsylvania	Y
196	Ward	Florida	Y
197	Warmbrodt, John	Missouri	Y
198	Walt, John	Tennessee	Y
199	Weathers, Phyllis		Y
200	Whitlow	Washington	Y
201	Wiggins	Texas	Y

EXHIBIT 1

Exhibit A No.			Response
202	Wildeboer, Jonathan	South Dakota	Y
203	Wilhite	Texas	Y
204	Williams, Dale (Pattie)	Texas	Y (Duplicate)
205	Williamson	Pennsylvania	Y
206	Wilson, Don	Oklahoma	Y
207	Wilson, Robert		Y
208	Wise	Michigan	Y
209	Witt	Montana	Y
210	Wood	Vermont	Y
211	Woods, Brady	Texas	Y
212	Woods, Charley	Kansas	Y
213	Woods, Rosemary	Kansas	Y
214	Woods, Ruthie	Texas	Y
215	Worden, Douglas	Washington	Y
216	Yarbrough	Michigan	Y
217	Zelenuk, Francis	Texas	Y
218	Mercado	Florida	Y
219	Cooper	New Hampshire	Y
220	[C]ruce	Florida	Y
221	Richards	Maryland	Y
222	Sherman	Texas	Y
223	Kinden		Y
224	McNair	Mississippi	Y
225	Do[d]d	Texas	Y
226	Strongheart	South Dakota	Y
227	Patin	Louisiana	Y
228	Carter	Oklahoma	Y
229	Harrison	New Hampshire	Y
230	Prince Chevrolet	Georgia	Y
231	Neal	Louisiana	Y
232	Weems	Louisiana	Y
233	Lihue Motors	Hawaii	Y
234	Montpeller	Mississippi	Y
235	Feenstra	Georgia	Y
236	Reagan	Tennessee	Y
237	Wilkerson	Florida	Y
238	Miles	Alabama	Y
239	Dryman	Texas	Y
240	Lee	Arizona	Y
241	McGinnis	Ohio	Y

Exhibit A No.			Response
242	McCool	Indiana	Y
243	Ubane		Y
244	Chanez		Y
245	Huggins	Georgia	Y
246	Dixon	Mississippi	Y
247	4 Flg Mtr Co.	Illinois	Y
248	Modgan Chev.	Virginia	Y
249	Hausman	New York	Y
250	Gillette	Georgia	Y
251	Simmons	Texas	Y
252	Carroll	Georgia	Y
253	Cerda	Texas	Y
254	Pugh	North Carolina	Y
255	Humphrey	W. Virginia	Y
256	McCreay	Illinois	N
257	Coatney	Florida	Y
258	Brennan	New York	Y
259	Moon	Texas	Y
260	Thacker	Virginia	Y
261	Albert	Virginia	Y
262	Helguin	Texas	Y
263	Ryder Truck	Texas	Y
264	Carlson	Washington	Y
265	Effie	Kansas	Y
266	Wagers	Kentucky	Y
267	Imhoff	Iowa	Y
268	Seibs	Arkansas	Y
269	Vergara	Texas	Y
270	Beck	Nevada	Y
271	Godoy	Texas	Y
272	Chavez	California	Y
273	Conely	Minnesota	Y
274	Coreale	Georgia	Y
275	Schmidtendorr	Indiana	Y
276	Herring	Texas	Y
277	Foster		Y
278	Franke	Iowa	Y
279	Giraud		Y
280	Holden	Wisconsin	Y
281	Martinez	Texas	Y

## EXHIBIT 1

Exhibit A No.			Response
282	McIrvin		Y
283	Ramirez	Texas	Y
284	Reynolds		Y
285	Roman		Y
286	Schonberg		Y
287	Schlepp	Kansas	Y
288	Chalmers	Michigan	Y
289	Flenory	Texas	Y
290	Gentille	Pennsylvania	Y
291	Brady	Michigan	Y
292	Hannah	Arizona	Y
293	LeClair	New Hampshire	Y
294	Moles	South Carolina	Y
295	Nichol	Oklahoma	Y
296	Ruskin		Y
297	Stephens		Y
298	Wilson	Oklahoma	Y
299	Wilborn	Kentucky	Y
300	Johnson	Connecticut	Y
301	Pattie	Texas	Y (Duplicate)
302	Cormier	New Hampshire	Y
303	Gaubert	Louisiana	Y
304	Harless	Texas	Y
305	Sturdivant	Tennessee	Y
306	Adcock		Y
307	Roundtree	Texas	Y
308	Almanza	Texas	Y
309	Bartu	Oregon	Y
310	Bishop	Oklahoma	Y
311	Bowles	North Carolina	Y
312	Bryant	Michigan	Y
313	Buie	Kansas	Y
314	Buster	Texas	Y
315	Chelf	Texas	Y
316	Clayton	Missouri	Y
317	Cortes		Y
318	Cruz	Texas	Y
319	Darling	Indiana	Y
320	Davis/Becker		Y
321	Diemann	Missouri	Y

Exhibit A No.			Response
322	Doe	Florida	Y
323	Dorsey		Y
324	Egyed	Ohio	Y
325	Edlin	Indiana	Y
326	Elwood		Y
327	Falcon	Louisiana	Y
328	Fitzgibben	Texas	Y
329	Fletcher	Indiana	Y
330	Flores	Florida	Y
331	Galvan	Virginia	Y
332	Gonzalez		Y
333	Halas	Texas	Y
334	Hamby	Michigan	Y
335	Hatter	Oklahoma	Y
336	Hazel	Kentucky	Y
337	Thoma		Y
338	Hernandez	Arizona	Y
339	Herrera	California	Y
340	Hershey		Y
341	Hunt	Ohio	Y
342	Jones	Oregon	Y
343	Joy	Arizona	Y
344	Klarlund	Missouri	Y
345	Klingman	Wisconsin	Y
346	Baker	Illinois	Y
347	Konkol	Washington	Y
348	Landrum	Oklahoma	Y
349	Threadgill	Mississippi	Y
350	Law	Louisiana	Y
351	League	Texas	Y
352	Lev	Pennsylvania	Y
353	Lovett	Nevada	Y
354	Reeder	Indiana	Y
355	McKee	Virginia	Y
356	Meadors	Texas	Y
357	Medina	New York	Y
358	Mendoza	California	Y
359	Bode	Illinois	Y
360	Moretz	Virginia	Y
361	Mulins		Y

## EXHIBIT 1

Exhibit A No.			Response
362	Martin		Y
363	Norton		Y
364	Norton		Y
365	Palacios	7/18/83	Y
366	Perez, B.	Nevada	Y
367	Perez	California	Y
368	Peterson	Washington	Y
369	Phillips	North Carolina	Y
370	Pomeroy	Ohio	Y
371	Racine	Connecticut	Y
372	Ricks	Texas	Y
373	Riley	Kansas	Y
374	Robertson	Kentucky	Y
375	Salce	California	Y
376	Schick	Oregon	Y
377	Smith	Kentucky	N
378	Smith	Indiana	Y
379	Straube	Texas	Y
380	Sturtevant		Y
381	Todd	Michigan	Y
382	Tschanz	Ohio	Y
383	Tso	Arizona	Y
384	Vara	Texas	Y
385	Vasquez		Y
386	Waterman	Michigan	Y
387	Weymouth	Virginia	Y
388	Saucier	Florida	Y
389	Tompkins	New York	Y
390	Timmerman	Texas	Y
391	Costamanga		Y
392	Brown	Georgia	Y
393	Devillier	Louisiana	Y
394	Liebfried		Y
395	Armitage		Y
396	Talley	Florida	Y
397	Henderson		Y
398	Shafer		Y
399	Frank	Arizona	Y
400	Tennyson		Y
401	Wilson		Y

## EXHIBIT 1

Exhibit A No.			Response
402	Fritschel	Illinois	Y
403	Elms	Indiana	Y
404	Givens		Y
405	Page		Y
406	Sharp	Missouri	Y
407	Demmth	Wisconsin	Y
408	Bullard		Y
409	Reavis	Georgia	Y
410	Petit	Illinois	Y
411	Guenther	Illinois	Y
412	Hartley	Indiana	Y
413	Sturgill	Kentucky	Y
414	Gayheart		Y
415	Trione	Oregon	Y
416	Mullins	Indiana	Y
417	Hendrix	Tennessee	Y
418	Daniel	Texas	Y
419	Kuvet	Texas	Y
420	Baldasare	Washington	Y
421	Turpin	W. Virginia	Y
422	King		Y
423	Chapman		Y
424	Ror[k]	Illinois	Y
425	Bartholomew		Y
426	Harris	New Jersey	Y
427	Hill	Texas	Y
428	Schnell[z]er	Arizona	Y
429	Eagar		Y
430	Price		Y
431	Gilmore	Louisiana	Y
432	Barthel		Y
433	Johnson		Y
434	Fox		Y
435	Brothers		Y
436	Long	Ohio	Y
437	Ramsay	Texas	Y
438	Herrara	Arizona	Y
439	Franklin	Arizona	Y
440	George		Y
441	Boyle	Illinois	Y

Exhibit A No.			Response
442	Zabel	Kansas	Y
443	Gregory		Y
444	Amundson		Y
445	Winstead	1/10/81	Y
446	Richardson	Texas	Y
447	Stanfield	Texas	Y
448	Haltermann	Illinois	Y
449	Hamilton	Kentucky	Y
450	Gray		Y
451	Dornhoff		Y
452	Glass		Y
453	Champagne	Florida	Y
454	LaPointe	New Hampshire	Y
455	Davis	New York	Y
456	Thompson	South Dakota	Y
457	Key	Texas	Y
458	Seale	Texas	Y
459	McCabe	Texas	Y
460	Wells	Michigan	Y
461	Yarger	Missouri	Y
462	Schadegg		Y
463	Sheppard	New Jersey	Y
464	Phillips	North Carolina	Y
465	Schumaker	Tennessee	Y
466	Laughlin		Y
467	Cathey	Texas	Y
468	Kircher		Y
469	Royer		Y
470	Smith	Florida	Y
471	Price		Y
472	Milligan	Maryland	Y
473	Stone	Missouri	Y
474	Edwards	Texas	Y
475	Boothe	Texas	Y
476	Manns	Virginia	Y
477	Mahenski		Y
478	Disney	Kentucky	Y
479	Glasgow	North Carolina	Y
480	Yutteman	Oklahoma	Y
481	Roy	Missouri	Y

## EXHIBIT 1

Exhibit A No.			Response
482	Flint	Missouri	Y
483	Walton		Y
484	Haire		Y
485	Kelchum	Texas	Y
486	Lewis	Alabama	Y
487	Chandler		Y
488	Hester		Y
489	Huddleston	Maryland	Y
490	Gunderson		Y
491	Sammons		Y
492	Stults		Y
493	Clayborn	Texas	Y
494	Guerrero	Texas	Y
495	Bennett	W. Virginia	Y
496	Kelly	Florida	Y
497	McLaughlin	Louisiana	Y
498	Traudt		Y
499	Franklin	Texas	Y
500	Irvin	Texas	Y
501	Hering	Texas	Y
502	Taylor	W. Virginia	Y
503	Mallock	Louisiana	Y
504	Andelia		Y
505	Deckard	Missouri	Y
506	Morgan	Missouri	Y
507	McConnell	Missouri	Y
508	Clay	Ohio	Y
509	Latshaw	Pennsylvania	Y
510	Swisher	Texas	Y
511	Ybarra	Texas	Y
512	Hunt		Y
513	Perfitt	Michigan	Y
514	Frazer		Y
515	Lowe	W. Virginia	Y
516	Rusher		Y
517	Marden	Utah	Y
518	Rivere	Louisiana	Y
519	Castellano	Florida	Y
520	Moon		Y
521	Polk	Alabama	Y

Exhibit A No.			Response
522	Eastman	Arizona	Y
523	Ogden	Oklahoma	Y
524	Castillo	Texas	Y
525	Haggitt	Michigan	Y
526	Freeland	Kansas	Y
527	Petree	Texas	Y
528	Saxon	Oklahoma	Y
529	Pugh	Oklahoma	Y
530	Weber		Y
531	Walbridge	Iowa	Y
532	Collins	Oklahoma	Y
533	Tucker	Texas	Y
534	Punches	Wisconsin	Y
535	Doe	Missouri	Y
536	King	Oklahoma	Y
537	Nichols	Oklahoma	Y
538	Schwarck	Texas	Y
539	Fox		Y
540	Gouge	Oklahoma	Y
541	Bourque	Louisiana	Y
542	Stephens	Tennessee	Y
543	Anderson	Texas	Y
544	Kruk	Illinois	Y
545	Williams	Missouri	Y
546	Blsson	New Hampshire	Y
547	Andrews	Pennsylvania	Y
548	Holcomb		Y
549	Ko[r]pal	Florida	Y
550	Cheek		Y
551	Gibson	Missouri	Y
552	Milwee	Texas	Y
553	Connolly		Y
554	Rosalez	Oklahoma	Y
555	Starkey	Oklahoma	Y
556	Lanier	Alabama	Y
557	Wirth		Y
558	Thibodeaux	Louisiana	Y
559	Peach	Tennessee	Y
560	Lingren		Y
561	Monceaux	Louisiana	Y

EXHIBIT 1

Exhibit A No.			Response
562	Bull		Y
563	Glaspie	Texas	Y
564	Kusser	South Dakota	Y
565	Shores		Y
566	Crawford	Kansas	Y
567	Vickers	Mississippi	Y
568	Heck		Y
569	Stickley		Y
570	Gilbertson		Y
571	Dickerson	Missouri	Y
572	Nathurst	Florida	Y
573	Loe	Louisiana	Y
574	Gurzan	Texas	N
575	Somers		Y
576	Graves		Y
577	Feight	Kansas	Y
578	Cornett	Tennessee	Y
579	Piazza		Y
580	Sauerwein	Kansas	Y
581	Gilmore	Michigan	Y
582	Grahek		Y
583	Plank	Nevada	Y
584	Kiefer	Oklahoma	Y
585	Blair	Michigan	Y
586	Riley		Y
587	Haney	North Carolina	Y
588	Rachui	Texas	Y
589	McChesney	Texas	Y
590	Slagel	Illinois	Y
591	Engle	Indiana	Y
592	Herbison	Kansas	Y
593	Matera	Texas	N
594	Silva	Texas	Y
595	Smith		Y
596	Hayes	Tennessee	Y
597	Jeschke		Y
598	Galvez		Y
599	Bailey	Washington	Y
600	Tapp	Wisconsin	Y
601	Ross	W. Virginia	Y

## EXHIBIT 1

Exhibit A No.			Response
602	Pollock		Y
603	Dollar	Louisiana	Y
604	Copland	Illinois	Y
605	Bouska	Michigan	Y
606	Whetsline	Oregon	Y
607	Lynch	Texas	Y
608	Eberhardt		Y
609	Desmond	New York	Y
610	Caldwell		Y
611	Shoemake		Y
612	Lacy		Y
613	Pinkerton		Y
614	Scalise	Illinois	Y
615	Hannah	Pennsylvania	Y
616	Cortez	Texas	Y
617	Hawkins	Alabama	Y
618	Lindahl	Michigan	Y
619	Singer	New Mexico	Y
620	Ohara	Ohio	Y
621	Faut	Nevada	Y
622	Vann	Alabama	Y
623	Schinzel	Florida	Y
624	Trobaugh		Y
625	Clark	Texas	Y
626	Blake	Arizona	Y
627	James	Ohio	Y
628	Wiseman	Missouri	Y
629	Webber	Texas	Y
630	Shope	Georgia	Y
631	Ake	New York	Y
632	Liechty	Iowa	Y
633	Hunt	Texas	Y
634	Lamkey	Missouri	Y
635	Jackson, J.		Y
636	Turbeville	Florida	Y
637	Sumner		Y
638	Gabaldon		Y
639	Baker, C.	Wisconsin	Y
640	Autenrieth	California	Y
641	Baran, M.	Illinois	Y

Exhibit A No.			Response
642	Bass, D.	Oklahoma	Y
643	Bragg, J.	North Dakota	Y
644	Claasen, J.	Iowa	Y
645	Gribal, H.	Illinois	Y
646	Glass, C.	Michigan	Y
647	Davis, W.	Texas	Y
648	Feehey, M.	South Carolina	Y
649	Fort, H.	Oregon	Y
650	Fowble, M.		Y
651	Garza, E.	Texas	Y
652	Hack, J.		Y
653	Hernandez, J.		Y
654	Jones, C.	Oklahoma	Y
655	Anderson, M.	Texas	Y
656	Mundy, F.	Oklahoma	Y
657	Simpson, D.	California	Y
658	Capton	New York	Y
659	Wilson, J.	New Mexico	Y
660	Lash, J.	Illinois	Y
661	Hanna	South Carolina	Y
662	Devillars, W.	California	Y
663	Dorman, O.	Washington	Y
664	Kearns		Y
664	Vaughn	Missouri	Y
665	Milner		Y
666	Doriaz		Y
667	Blanton		Y
668	Frausto		Y
669	Sawyer		Y
670	Yanowski		Y
671	Godby		Y
672	De Cortes		Y
673	Williams		Y
674	Flippo		Y
675	Shudiak		Y
676	Linck		N
677	Doran		Y
678	Tumer		Y
679	Gilbert		N
680	Burns		N

Exhibit A No.			Response
681	Faircloth		N
682	Zion		N
683	Arrizabalgo		N
684	Wales, W.		N
685	Labor		N
686	Dorough		N
687	Hilburn		Y
688	Sandoval	California	Y
689	Marty	Texas	Y
690	Smith	Tennessee	Y (Duplicate)
691	Sparacino	Texas	Y
692	Bean	Texas	Y
693	Brown	Alabama	Y
694	Degroot	Minnesota	Y
695	Granados	California	Y
696	Durocher	Louisiana	Y
697	Nelson	Mississippi	Y
698	Slusser	Louisiana	Y
699	Mann	Texas	Y
700	Beeson	South Dakota	Y
701	Curtis	Tennessee	Y
702	Seebeck	Georgia	Y
703	Anderson	Texas	Y
704	Desylva	Oklahoma	Y
705	Henrie	Pennsylvania	Y
706	Smith	Texas	Y
707	Osredkar	Michigan	Y
708	Kibby	Michigan	Y
709	Reynard	Canada	Y
710	Dalton	Georgia	Y
711	Hartman	Washington	Y
712	Wolfe	Michigan	Y
713	Landry	Alabama	Y
714	Dutton	Georgia	N
715	Meyers/Hurt	North Dakota	N
716	Connelly/ Johnson	Washington	N
717	Richardson	Louisiana	Y
718	Howard		N
719	Decker	Tennessee	Y
720	Thompson	Maryland	Y

EXHIBIT 1

Exhibit A No.			Response
721	Zygmunti	Illinois	N
722	Evans	Florida	N
723	Eastridge	Texas	N
724	Youngblood		N
725	Marquez	Texas	N
726	Neufeld	Oklahoma	Y
727	Ellen	Arizona	N
728	McComas	Oklahoma	Y
729	Douglas	California	Y
730	Barnes	South Carolina	Y
731	Peterson	Kansas	Y
732	Allen, T		Y
733	Anderson, J.		N
734	Anthony Crane Rental		N
735	Antoncich, C		Y
736	Ball, S.		Y
737	Barker, R.		Y
738	Bingham, W.		N
739	Bird, W.		Y
740	Birth, K.		N
741	Brewer, L.		Y
742	Brock, D.		N
743	Carter, S.		Y
744	Chilcoat, J.		Y
745	City of Calgary		N
746	Clark, H.		Y
747	Costa, M.		Y
748	Demeritt, C.		Y
749	Doe, J.		Y
750	Ehmann, G.		N
751	Erikson, S.		Y
752	Floral Design		N
753	Garey, J.		Y
754	Graves, F.		Y
755	Guevara, A.		Y
756	Gutierrez, H.		N
757	Harvey, T.		Y
758	Heam, R.		N
759	Hemandez, E.		Y
760	Jones, B.		Y

Exhibit A No.			Response
761	Jones, J.		Y
762	MacNevin, D.		Y
763	McGarrah, M.		Y
764	McGuire, B.		N
765	Mendoza, M.		Y
766	Miller, W.		N
767	Moore, K.		Y
768	Rios, R.		Y
769	Rogers, D.		N
770	Screen, S.		N
771	Seguin, J.		N
772	Shiring, E.		N
773	Shults, G.		N
774	Smith, M.		Y
775	Squier, R.		Y
776	Stevens, N.		N
777	Tackett, R.		Y
778	Taylor, R.		N
779	Wagner, G.		N
780	Wotherspoon, C.		N
781	Young, R.		Y
782	Zembrzycki,	O.	N